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July 6, 2005

Dennis S. O'Leary, MD

President

Joint Commission on Accreditation of Healthcare Organizations

One Renaissance Blvd.

Oakbrook Terrace, IL 60181

Dear Dr. O'Leary:

Members of the American College of Emergency Physicians (ACEP) continue to express concern about standards that address the assessment and treatment of pain. The College represents more than 23,000 emergency physicians and clearly supports the intent of the standards to educate, assess and appropriately manage patient pain. Unfortunately the reality in emergency departments (EDs) can be somewhat different with chronic pain and substance abuse patients demanding they receive pain medication that in the view of the treating physician is inconsistent with sound medical judgment.

In Standard PC.6.10 the scope of education that is required including: understanding of pain, risk for pain, importance of effective pain management, pain assessment process and methods of pain management for the patient and the family, is extensive. For a patient that is being treated for pain that is self limiting it is often not necessary to provide in depth education on the treatment of pain. In the ED both verbal and written discharge instructions are provided to the patient. The College is concerned that the education outlined in the standard is too broad and therefore not appropriate for the ED setting and that the relevant verbal and written instructions provided in the discharge instructions addressing treatment for pain should be recognized by JCAHO as meeting the standard.

An interpretation of the standards that addresses these concerns and the expectations for meeting these standards in the ED would be appreciated. Please contact Margaret Montgomery, RN, MSN at 972-550-0911, ext 3230 if you have any questions.

Sincerely yours,

<signed>

Robert E. Suter, DO, MHA, FACEP

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