

January 22, 2007

Dennis S. O'Leary, MD President The Joint Commission One Renaissance Blvd Oakbrook Terrace, IL 60181

Dear Dr. O'Leary:

The American College of Emergency Physicians (ACEP) appreciates the opportunity to review the Proposed Hospital Disruptive Behavior Standards and supports the addition of a standard that addresses disruptive behavior in the hospital setting.

Expert reviewers agreed that confronting disruptive behavior is essential for patient safety and quality care although concern was expressed about ensuring that hospitals have latitude to define appropriate and inappropriate behavior, develop policies and educate staff accordingly. The definition of disruptive behavior provided with the review form differed from the one in the Proposed Standards. The term "facial expressions" was provided as an indicator of disruptive behavior in the definition on the review form and was viewed as too broad with the potential for over-interpretation.

The review comment form is attached. Please contact Margaret Montgomery, RN, MSN, at 972.550.0911, extension 3230 if you have any questions.

Best wishes,

<signed>

Brian F. Keaton, MD, FACEP President

Attachment

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Proposed Hospital Disruptive Behavior Standards Field Review

Which of the following best represents your perspective when answering this survey? (Select one)

Other Professional Organization – American College of Emergency Physicians

Disruptive Behavior Standard Specific Questions

At this point, if you have not already reviewed the proposed standard and elements of performance for disruptive behavior, please do so. The following questions pertain specifically to the proposed disruptive behavior standard.

Please read the disruptive behavior definition below.

Disruptive behavior is conduct displayed by a health care professional that negatively impacts the quality or safety of care or has the potential to do so. Disruptive behavior may also intimidate staff, affect morale, and thereby lead to staff turnover. It may be verbal or non-verbal, and often involves the use of rude language, facial expressions, threatening manners or even physical abuse.

Based on the definition, is the term "disruptive behavior" the most suitable term to use?

Yes

Do the proposed standard and elements of performance cover important aspects of managing disruptive behavior? (Select one)

Yes

Select the statement that best describes your opinion regarding the proposed disruptive behavior standard (Select One)

The proposed standard should be adopted with modifications

Is there any aspect of managing disruptive behavior that should be considered as a National Patient Safety Goal?

No

Please provide additional comments or concerns you have regarding the proposed disruptive behavior standard.

Statement of Elements of Performance for LD 3.15

2) Defining desirable and disruptive behavior is difficult and hospitals should be given latitude in these definitions.

The proposed standards do not include "facial expression" in the definition of disruptive behavior although it is included in the definition on the review response form. Expert reviewers took exception to including this as an indicator of disruptive behavior as it is too broad and prone to over interpretation.