

The Honorable Leslie V. Norwalk  
Acting Administrator  
Centers for Medicare and Medicaid Services  
Room 314G  
Hubert H. Humphrey Building  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Ms. Norwalk:

Physician Hospitals of America (PHA) is the national organization that represents the nation's physician owned hospitals. We are writing to express our support for the April 26 memorandum to State Survey Agency Directors clarifying the requirements for the provision of emergency services to patients.

We are gratified that the requirements apply to all hospitals. There is no relationship between hospital ownership and patient safety. Patient safety is a function of clear policy and trained staff that is able to carry out the policies of the hospital properly. If staff cannot discharge their patient care responsibilities effectively, then all patients are at risk, regardless of the size of the hospital or its ownership.

PHA agrees that calling 911 cannot be a substitute for the hospital's own ability to provide essential care in emergency situations. Hospitals must have the capacity to properly appraise people with emergencies, initiate necessary treatment, and handle transfers when needed. The use of 911 should be limited to arranging transport for patients after they have been evaluated and treatment has been initiated. We are pleased that the guidance makes this distinction very clear.

Patient safety in hospitals is a critical issue in our healthcare system. Far too many Americans are injured or die because of medical errors and hospital acquired infections. Until every hospital has successfully addressed these situations, it is incumbent upon CMS to regularly remind all hospitals of their responsibilities to patients.

Should you need more information on PHA and physician ownership of hospitals, please feel free to contact PHA's Executive Director, Molly Gutierrez at 605-275-5349.

Sincerely,

Doug Johnson  
President

Cc: Thomas E. Hamilton