



Steven Hirsch & Associates
Healthcare Management Support Systems

**Governing Body Appointment Required for Infection Prevention
and Antibiotic Stewardship Leaders**

By Steven Hirsch, MPA, FACHE

The Medicare “Conditions of Participation” have been updated effective February 2020, and Joint Commission Standard IC.01.01.01 EP 6 has been revised effective July 1, 2020 to require that the Infection Prevention and Control Officer be appointed by the Governing Body of the Hospital. 42 CFR 482.42(a)(1) states “Infection prevention and control program organization and policies. The hospital must demonstrate that:

(1) An individual (or individuals), who is qualified through education, training, experience, or certification in infection prevention and control, is appointed by the governing body as the infection preventionist(s)/infection control professional(s) responsible for the infection prevention and control program and that the appointment is based on the recommendations of medical staff leadership and nursing leadership.”

Similar language has been incorporated into Joint Commission standard IC.01.01.01, EP 6. “For hospitals that use Joint Commission accreditation for deemed status purposes: An individual(s) who is qualified through education, training, experience, or certification in infection prevention and control is appointed by the governing body to be responsible for the infection prevention and control program. The appointment is based on recommendations of medical staff leadership and nursing leadership.”

It is suggested that an appointment letter designating the hospital’s Infection Prevention and Control Officer be prepared and submitted to the Governing Body. The appointment letter(s) must be kept on file with the Infection Prevention and Control Plan.

Similarly, there is a new CMS requirement at 42 CFR 482.42 (b)(1) and Joint Commission standard MM.09.01.01 EP9 that “An individual(s) who is qualified through education, training, or experience in infectious diseases and/or antibiotic stewardship, is appointed by the governing body as the leader(s) of the antibiotic stewardship program”, based upon recommendations of the medical staff leadership and pharmacy leadership.

The appointment letter for the Antibiotic Stewardship Leader should be retained on file with the Antibiotic Stewardship Plan.

**Should you need any assistance with development of the appointment letters,
please feel free to contact us.**

Call or email us today for more information!
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