

March 28, 2013

Kathleen G. Lawrence, MSN, RN, CWOCN President Wound Ostomy and Continence Nurses Society 15000 Commerce Parkway, Suite C Mt. Laurel, New Jersey 08054

Dear Ms. Lawrence:

Jerod Loeb asked me to respond to your recent letter seeking clarification of the relationship of the Universal Protocol (UP) to identifying the site of stomas by wound ostomy and continence (WOC) nurses. We understand that WOC nurses provide an important service by locating the best place for a stoma in order to maintain the patient's daily living routine and preserve quality of life.

The intent of the UP is to reduce wrong site, wrong person, and wrong procedure surgery, and for that reason, the UP requires the person performing the procedure to mark the site, with limited exceptions.

In the way the procedure is frequently performed, the stoma site and the site of the surgical incision are not the same. The surgeon performs an invasive procedure that results in bowel or bladder diversion, which is then managed through a stoma. In these situations, the surgeon marks the incision site. The WOC nurses provide guidance to the surgical team on the best site for the stoma. This is consistent with the joint position statements of the Wound Ostomy and Continence Nurses Society, the American Urological Association and the American Society of Colon and Rectal Surgeons.

Because the stoma site is actually secondary to the primary surgical site, The Joint Commission does not believe that the UP applies to stoma site marking. Therefore, The Joint Commission's position is that the WOC nurses may act within the scope of their practice and licensure to coordinate the site of the stoma with the surgical team; this may include marking that site. The site of the primary invasive procedure is covered by the UP and, therefore, should be marked by the surgeon performing the procedure.

I hope this clarifies the application of the Universal Protocol to identifying the site for stomas. Please let me know if you have any questions.

Sincerely,

Robert A. Wise, MD Medical Advisor

Division of Healthcare Quality Evaluation

Cc: Jerod M. Loeb, PhD – Executive Vice President

Nicolette Zueccaa, MPA, CAE - Executive Director, WOCNS

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