



West v. Atkins, 487 U.S. 42, 51 (1988)

The inmate tore his left Achilles tendon while playing volleyball at a state prison in which he was incarcerated. The physician treated the inmate's injury by placing his leg in a series of casts. The inmate claimed this was a violation of his Eighth Amendment right to be free from cruel and unusual punishment. The inmate claimed that the physician failed to provide adequate treatment. After granting certiorari, the Court determined that the physician's professional and ethical obligation to make independent medical judgments did not set him in conflict with the state and other prison authorities. The Court held that the physician, as an employee of the state, acted under color of state law when he treated the inmate's injuries.

On the Question of Physician and Prison Official Standards of Conduct, the Court Looked to AMA

North Carolina's institutions, which Doctor Atkins was required to observe, declares: "The provision of health care is a joint effort of correctional administrators and health care providers, and can be achieved only through mutual trust and cooperation." Similarly, the American Medical Association Standards for Health Services in Prisons (1979) provide that medical personnel and other prison officials are to act in "close cooperation and coordination" in a "joint effort."