



October 25, 2006

Marc P. Volavka
Executive Director
Pennsylvania Health Care Cost Containment Council
225 Market Street, Suite 400
Harrisburg, PA 17101

Dear Mr. Volavka:

We welcome the opportunity to submit comments regarding the PHC4 Report on Hospital Acquired Infections.

The infection rates at Penn Presbyterian Medical Center were lower than those reported for both the state and our peer group in all categories except catheter-associated bloodstream infections. Our own ongoing surveillance and quality improvement initiatives identified this during our 2005 fiscal year. We implemented a variety of interventions to address the issue. The program that we implemented was derived from the Central Line Bundle promoted by the Institute for Healthcare Improvement and includes a hand hygiene initiative, use of maximal barrier precautions, chlorhexidine skin antisepsis, optimal catheter site selection, and prompt removal of catheters. We are confident this program will result in decreased rates of bloodstream infections.

Although our overall mortality rate and the mortality rate among admissions without infections are lower than those reported for the state overall and for our peer group, the mortality rates associated with the reported infections are higher. As noted in the PHC4 Report, these rates are associated with the reported infections, however the deaths cannot be attributed to the infections. Indeed, we reviewed the records of all of these cases and found that none of the deaths were directly attributable to the infections. We do not dispute the accuracy of the report or the presence of the infections, but these individuals died of other causes. We believe the mortality rates are directly related to the high level of complexity and severity of illness of the patients receiving care at our institution. Indeed, Penn Presbyterian Medical Center has the second highest Case Mix Index in the Philadelphia region. This fact, along with the inability to identify infection as a direct cause of death upon detailed chart review, validates our hypothesis.

Penn Presbyterian Medical Center strives to provide the highest quality of medical care to our patients. We will continue to work to reduce and ultimately eliminate hospital-acquired infections.

Very truly yours.

Michele M. Volpe

Executive Director & CEO

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