

December 9, 2002

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

Dear Mr. Volavka:

Holy Spirit Hospital appreciates the opportunity to comment on the 2001 Hospital Performance Report that will be released to the public on or about Thursday, December 19, 2002. Our comments relate to length of stay, readmission rates, and mortality rates.

The length of stay for individual hospitals are compared to the Central and Northeastern Region and the Statewide averages. Internal analysis of Holy Spirit Hospital's patients reveals a significantly older patient population with a high comorbidity rate, which must be considered when comparing length of stay. Holy Spirit initiated a new case management program in 2002 to focus on decreasing length of stay, while maintaining quality care.

All readmissions are reviewed at Holy Spirit Hospital to assess if there is a relationship to the previous hospital stay. Cases that are questionable are analyzed as a component of our quality assurance program to determine if there was an unresolved problem at the time of discharge that may have precipitated the readmission. This is an ongoing process at Holy Spirit to help ensure that quality care is being provided to the community.

It is the practice of Holy Spirit Hospital and its Medical Staff to conduct a quality review of the records of expired patients. This year's report finds that we had a higher than expected mortality rating for patients in five DRGs. Our review of these cases shows that the patients were diagnosed and treated appropriately. Quality of care concerns were not identified. The average age of these patients was 79 years. In addition, 82% Mr. Marc P. Volavka December 9, 2002 Page 2

of these patients had do not resuscitate (DNR) orders. According to the Council, DNR is not included in the risk adjustment calculations at this time. We understand that MediQual is working to add this element in the future.

Again, we appreciate the opportunity to comment on this draft report and look forward to the release of the final report. Thank you.

Sincerely,

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Charles A. DeLone, M.D. Vice President of Medical Affairs