



June 6, 2016

Joe Martin, Executive Director  
Pennsylvania Healthcare Cost Containment Council  
225 Market St, Suite 400  
Harrisburg, PA 17101

Dear Mr. Martin,

Thank you for the opportunity to submit comments regarding PHC4's Report on Spinal Fusions. We appreciate Pennsylvania Healthcare Cost Containment Council's efforts to identify opportunities to contain costs and improve the quality of health care delivery in the state of Pennsylvania.

At Penn Medicine, we are committed to improve the patient experience through integrated, high quality service across the continuum of care. We are invested in assuring safe care and have blended multiple nationally recognized safety measures to create a Preventable Harm Index for use throughout our Health System. We systematically measure, track, and determine opportunities to improve care delivery on an ongoing basis and continue to lead our peers in these efforts.

The report indicated a higher than expected in-house complication rate at the Hospital of the University of Pennsylvania. With review, we determined the majority complications were related to revision spinal surgery. There is a significantly higher risk of durotomy in patients who undergo a revision surgery (multiple spinal surgeries), as compared to a primary intervention, due to the fact that scar tissue obscures, and adheres to, the normal dura. As you know, as a tertiary care center, we are often taking care of patients who have received surgery at other institutions and need complex revision surgery.

We agree with your stance that these patients be excluded from reporting and will work with our coding teams to ensure the proper codes are applied to aid you in separating revision surgery from primary surgery. We have assembled a multidisciplinary team and the Penn Medicine Coding Academy is working to assure proper refusion identification.

Penn Medicine is committed to decrease complication rates and will continue efforts to track and review all spinal fusion complications. As part of our ongoing efforts to improve neurosurgical care we audit every case that has an unexpected outcome and randomly select from all others to confirm consensus in the setting of excellent care. As one of the leading hospitals that perform complicated revision surgery, we will use the results in the Spinal Fusion report to continue to improve the specialized, complex care we provide at Penn Medicine.

If you have any further questions please feel free to contact me.

Best regards,

Patrick J. Brennan, MD  
Chief Medical Officer and Senior Vice President