Goal 1: Slow the emergence of resistant bacteria and prevent the spread of resistant infections.

Response 1

My comments are regarding Goal 1 of the National Action Plan for Combating Antibiotic-Resistant Bacteria. Prevention is dealt with only superficially and in the context of detection and control of outbreaks. However, drug resistant bacteria are becoming endemic. For example, MRSA is endemic in 2% of the population with research indicating an even higher incidence in healthcare workers.

The recent study by Chen LE, et al., in Infection Control Hospital Epidemiology confirms previous research and illustrates the rapid spread of MRSA. Active surveillance for carriers of endemic MDROs in non-outbreak settings is of utmost importance. The VA and NHSN have had dramatic reductions in MRSA infections by incorporating surveillance and isolation (full contact precautions) into their infection bundles.

If we are just reactionary and initiate protocols only when a facility defined outbreak occurs, we will not meet national goals. We need to focus on driving down the baseline.

In the 2018 Key Strategies the only specific protocol which was mentioned for inclusion in education was hand hygiene. However, much more needs to be specified. In the context of drug resistant bacteria, hand hygiene is a backup measure, since these organisms should not be on a healthcare worker's hands in the first place.

The committee should expand its focus on prevention to include patients and healthcare workers to undergo routine active surveillance for carriage of endemic MDROs. A reporting system of healthcare workers carriage and infections along with an economic safety net for those affected also needs to be implemented. References 1 - Links or citations only

Luke F. Chen, Lauren P. Knelson, Maria F. Gergen, Olga M. Better. A prospective study of transmission of Multidrug-Resistant Organisms (MDROs) between environmental sites and hospitalized patients—the TransFER study patients—the TransFER study. Infection Control & Hospital Epidemiology. Published online: 14 November 2018 https://doi.org/10.1017/ice.2018.275

Domestic or International: Domestic

Relates to: Human health

Goal 2: Strengthen national One Health surveillance efforts to combat resistance.

Response 2

It is imperative that we have data for action. Routine surveillance of our general population for carriage of MDROs is of utmost importance to accurately determine the rate of carriage and which MDROs have become endemic. For example, active surveillance for MRSA should be performed on all preoperative patients and all patients admitted to a healthcare facility. The same is true for other MDROs which my have become endemic in the population the facility serves. In addition, the ambiguous, facility-defined term "outbreak" needs to be abandoned and epidemiological decisions based upon actual numbers of infected patients.

References 2 - Links or citations only Domestic or International: Domestic

Relates to: Human health

2 of 3 1/2/2019, 8:16 PM