

September 21, 2009

Kevin T. Kavanagh, MD, MS, FACS
Health Watch USA
3396 Woodhaven Dr.
Somerset, KY 42503

Dear Dr. Kavanagh:

This letter is in response to your request for a Joint Commission position statement regarding the public reporting of healthcare-acquired infection (HAI) rates. You have indicated that this request is made in conjunction with a possible legislative initiative in the Commonwealth of Kentucky. While The Joint Commission typically does not create position statements on possible or proposed state-level legislation dealing with issues not directly germane to our accreditation process, the following is general information regarding The Joint Commission's historical involvement in performance measurement, and HAI rate reporting in particular:

1. In 2002, The Joint Commission created the first national performance measurement system for hospitals, using standardized, or "core" measures. In 2004, The Joint Commission and the Centers for Medicare & Medicaid Services (CMS) announced a joint effort to precisely align current and future measures common to both organizations. These standardized common measures now form the basis for hospital internal quality improvement and federal public reporting. Moreover, several states and public and private payer organizations rely on these measure results for either pay-for-reporting or pay-for-improvement programs. Hospital-specific results are publicly reported by The Joint Commission at www.qualitycheck.org.
2. The Joint Commission supports the creation of a national infection control performance measurement program. Such a program should utilize standardized, validated, and evidence-based process and outcome measures. Today, a number of states have developed or are developing mechanisms to collect and report data on different types of infections, using different measurement specifications, inclusions and exclusions. This state-by-state approach will likely lead to duplicative, redundant and costly reporting as it strives to meet the differing needs of the public and numerous other stakeholders (private payers, purchasers, Medicare, state Medicaid authorities and accrediting organizations, to name a few). This approach is not consistent with our desire to create a program where the infection rate information will not only be understandable to patients, payers and purchasers through public reporting, but also actionable for hospitals, ambulatory surgery centers and individual practitioners.

Kevin T. Kavanagh, MD

September 21, 2009

Page 2

3. The Joint Commission has participated in the development of infection control measures that are valid and reliable. The Surgical Care Improvement Project measures were developed in collaboration with the Agency for Healthcare Research and Quality, American College of Surgeons, CDC, CMS and several other groups and have been subsequently endorsed by the National Quality Forum. This is an example of a measure set, focusing on specific procedures rather than global rates, which has been created using the best scientific methods, and validated through pilot testing. It is imperative that any infection rate measure designed for public reporting go through a similar rigorous process, to ensure that the data reflect the actual number of infections originating at the reporting organization, rather than the relative success (or failure) of case finding by the infection control professional(s).

4. The Joint Commission stands ready to support the development of appropriate infection rate measures at the national level. In fact, through our work with the National Priorities Partnership, various arms of the Department of Health & Human Services, the National Quality Forum, the Hospital Quality Alliance, and the Ambulatory Quality Alliance, we are involved in a current effort. We encourage Health Watch USA to participate in the discussion with other national organizations to consider the development of a national reporting network for infection rates.

Please feel free to contact me at mcrafton@jointcommission.org or (630) 792-5260 should you need further information on The Joint Commission or our efforts in the field of performance measurement and infection control.

Sincerely,



Mark A. Crafton, MPA, MT(ASCP)
Executive Director, State & External Relations
Division of Business Development, Government & External Relations