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Director

State of California—Health and Human Services Agency
California Department of Public Health



ARNOLD SCHWARZENEGGER
Governor

February 26, 2010

AFL 10-01

TO: Acute Psychiatric Hospitals
General Acute Care Hospitals
Special Hospitals

SUBJECT: Clarification for Reporting of Healthcare Acquired Pressure Ulcers (HAPU)

The California Department of Public Health (CDPH or Department), Licensing and Certification (L&C) Program has received inquiries regarding the Department's position on the reporting of deep tissue injuries (DTI) under the adverse reporting requirements.

The term "adverse event" is defined in Health and Safety Code (H&S) Section 1279.1(b) and includes any one of 28 events. Specifically HSC Section 1279.1(b)(4)(F) states, that for the purposes of the reporting requirement above, an adverse event includes a Stage 3 or 4 ulcer, acquired after admission to health facility, excluding progression from Stage 2 to Stage 3 if Stage 2 was recognized upon admission.

Pursuant to, HSC Section 1279.1(a) all general acute care hospitals, acute psychiatric hospitals, and special hospitals must report an adverse event to the Department no later than five days after the adverse event has been detected, or, if that event is an ongoing urgent or emergent threat to the welfare, health, or safety of patients, personnel, or visitors, not later than 24 hours after the adverse event has been detected. Further, HSC Section 1279.1(c) requires the facility to inform the patient or the party responsible for the patient of the adverse event by the time the report is made.

The National Pressure Ulcer Advisory Panel (NPUAP) defines a suspected DTI as a purple or maroon localized area of discolored intact skin or blood-filled blister due to damage of underlying soft tissue from pressure and/or shear. The NPUAP states that the area may be preceded by tissue that is painful, firm, mushy, boggy, warmer or cooler as compared to adjacent tissue. According to the NPUAP Staging Task Force, a suspected DTI is one step below a Stage 1 ulcer.

Based upon the NPUAP's definition of a DTI, the tissue involvement of a DTI does not support a Stage 3 or 4 pressure ulcer. Thus, CDPH L&C does not require the reporting of a DTI as an adverse event. However, should the DTI progress to a Stage 3 or 4 ulcer

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after admission to the hospital, the hospital would then be required to report the ulcer as an adverse event to CDPH L&C.

If you have any questions concerning this letter, please contact your respective District Office.

Sincerely,

Original Signed by Kathleen Billingsley, R.N.

Kathleen Billingsley, R.N.
Deputy Director
Center for Health Care Quality