



Division of Infectious Diseases
City Tower, Suite 400
101 The City Drive
Orange, California 92868
(714) 456-7612 Office
(714) 456-7169 Fax

To: California HAI Committee

Re: California HAI Subcommittee on Metrics for Public Reporting :
Guidance for January HAI Report

The Subcommittee on Metrics for Public Reporting has been deliberating the quality of hospital data and the intent to provide a January HAI report for public consumption. The following reflects the Subcommittee's strong recommendations following several extensive discussions.

It is the unanimous recommendation of this Subcommittee that the quality of hospital level data should preclude an HAI report for January 2011. The reasons for this include the following:

- This would be the sole report based upon hospital self-reported data external to NHSN, lacking any external validation and lacking comparability to later reports. This will produce confusion for both hospitals and the public.
- California hospitals were not provided with adequate standardization for data collection prior to April 2010. As a result, hospital methodology for determining cases and denominators varied widely and these data cannot be compared in a valid way. This applies to all measures currently under consideration for a January report (CLABSI, VRE BSI, MRSA BSI, and CDI). Restricting reports to reported NHSN data from April 2010 onward will allow standardization.
- Prior to April 2010, hospitals were instructed to report limited data without stratification. Thus, risk adjustment is not possible, and there is no way to adequately consider inherent differences in the challenges faced by diverse hospitals. Since the case mix of chronically and critically ill patients varies extensively within and across hospitals (e.g. ICU vs non-ICU areas; oncology vs general ward; tertiary care vs community hospital case mix), reported rates will lack comparability.
- Reporting of unadjusted rates is inconsistent with current state law (ex. 1288.55 c.1) and can be unfairly punitive to hospitals which care for the sickest patients in the state. Release of a hospital-specific January HAI report providing unadjusted rates derived from non-standardized data collection external to NHSN would be uninterpretable and highly misleading to both hospitals and the public. Restricting reports to reported NHSN data from April 2010 onward will allow risk adjustment.
- There are plans to spend a large amount of state labor effort on repeating collection of hospital-wide data of CLABSI for this one report since hospitals were permitted to report a variety of data (ICU only, whole hospital, partial data excluding what was already reported to NHSN). Even if all hospitals were able to retrospectively report hospital-wide data, the lack of standardization during the initial data collection means that large

differences will persist across hospitals. Effort, labor costs, and energy would be better directed toward the June report which is based on NHSN and their detailed module instructions and definitions.

- Aggregated data at the level of the state would prevent hospital-level evaluations of non-comparable data. Nevertheless, even aggregated data would not be valid or meaningful due to differences in surveillance practices across California hospitals. Without assurance of the comparison of like measures, it would not be possible to use California measures for intra-state or inter-state comparisons.

In contrast, the Metrics Subcommittee is strongly advocating for the investment of time, labor, and resources into a hospital-level June 2011 HAI report that is responsive to the public by providing reasonably valid comparisons based upon standardized NHSN data collection and risk stratification.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Susan Huang". The signature is fluid and cursive, with the first name "Susan" and the last name "Huang" clearly legible.

Susan Huang, MD MPH
Chair, California HAI Subcommittee on Metrics for Public Reporting
Hospital Epidemiologist
University of California Irvine