



**Ephrata  
Community  
Hospital**

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March 22, 2010  
*Sent via fax: (717) 232-7029*

Joseph Martin,  
Executive Director,  
PA Health Care Cost Containment Council  
225 Market Street, Suite 400  
Harrisburg PA 17101

Re: Public Comment on the continued collection of laboratory data

Dear Mr. Martin,

This letter is in response to the PA Health Care Cost Containment Council (PHC4) seeking public comment regarding PHC4's continued collection of laboratory (lab) data to be used for the purposes of risk adjusting healthcare outcomes. First, we would like to acknowledge the efforts of the Commonwealth, including PHC4, to address the data collection burdens for hospitals in Pennsylvania including the provisions of Act 3 of 2009 which eliminates the requirement for contracting with a specific vendor for submission of data elements. It is indeed a challenging time for hospitals and any efforts to decrease the financial and administrative burdens for hospitals are appreciated.

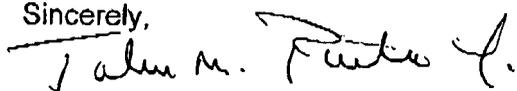
As PHC4 is considering formats for submission of the lab data elements, we would like to encourage PHC4 to consider not only the limited resources of PHC4 that were referenced in the bullet points contained in the March 20, 2010 PA Bulletin Notice, but also the limited resources currently available to Pennsylvania hospitals. We would encourage PHC4 to permit hospitals to have as much flexibility as possible for methodologies to submit the data. In particular, we would encourage the continued option to use the Atlas System to submit the data to PHC4 due to the significant financial and operational resources that Pennsylvania hospitals have already devoted to implementing the Atlas System. Ephrata Community Hospital has incurred considerable consultant expenses developing an interface between the Hospital's electronic medical record system and the Atlas System for downloading demographic and lab data to the Atlas/Quantros System. Our Hospital utilizes the Atlas/Quantros System internally for quality improvement and utilization review activities and also for submission of our core measure data. If PHC4 were to now implement a new process for submitting the lab data other than using the Atlas/Quantros System, our Hospital

would need to expend additional resources to collect and submit the lab data to PHC4 in the new format. As you know, additional resources are not something that is available to hospitals at this time.

The published Notice indicated that PHC4 was particularly seeking input regarding several technical questions. We believe that by continuing to permit the option of using the Atlas/Quantros System to submit the data, these questions can be addressed by Quantros as the vendor.

We appreciate PHC4's efforts to keep Pennsylvania hospitals informed and involved in the process of implementing these changes. Thank you for your attention to these comments.

Sincerely,



John M. Porter, Jr.  
President/CEO



Leslie M. Kuipers  
In House Counsel, PHC4 Contact