

April 20, 2010

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

Dear Mr. Martin,

Lehigh Valley Health Network welcomes the opportunity to submit comments on the continued collection of laboratory (lab) data to be used for the purposes of risk-adjusting healthcare outcomes.

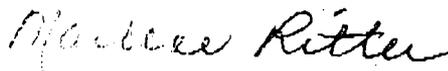
There are several concerns that we wish to raise. Council wants to know the issues to consider in using the first or the worst lab values for selected lab tests. While the first value would be the easiest to submit one must question which will provide the most accurate risk-adjustment. The Council's Technical Advisory Group and Data Systems Committee compared present-on admission data and/or lab data. It was found that at the hospital level the lab data provided more appropriate risk adjustment. Was the first lab value or the worst value used in this analysis? It would be our recommendation to use the value which provides the best assessment of risk at the hospital level or more specifically at the condition or procedure level. This decision should not be based upon what is easiest to collect but rather what is clinically appropriate. The risk-adjustment methodology should also be provided to hospitals so that they can measure their performance on a more concurrent time frame prior to the public data releases.

It is difficult to comment on many of Council's questions without knowing the data specifications. We may have the resources needed to supply the data directly to PHC4 but cannot determine whether contracting with a third party vendor is the wiser choice. The file format is easy when the specifications are known. It is also difficult to determine increased or decreased costs without knowing these same specifications.

Hospitals also need adequate time between when the specifications are known and the deadline to begin the new submission process. Adequate time would allow those hospitals who can submit directly the ability to develop files. Hospitals should also be provided with the data quality testing methodology so they can test their own data submission files prior to submission.

Again thank you for the opportunity to submit comments. We would very much like to submit comments to some of these same questions when the data requirements are known to Council.

Sincerely,



Marlene Ritter, RRT, CPHQ  
Director, Quality & Patient Safety