

Mercy Health System  
1 West Elm St.  
Conshohocken, Pa. 19428

April 6, 2010

Joe Martin, Executive Director  
Pennsylvania Health Care Cost Containment Council  
225 Market St.  
Suite 400  
Harrisburg, PA 17101

Dear Joe Martin:

**Subject: PHC4 request for Comments on Laboratory Data Collection**

In response to PHC4's request for input, Mercy Health System requested input from the four acute care facilities; Mercy Fitzgerald Hospital, Mercy Philadelphia Hospital, Mercy Suburban Hospital and Nazareth Hospital. The following summarizes the feedback received from the facilities.

- The MHS facilities do not have an issue reporting directly to PHC4; however, there will be an issue with building an interface from the Laboratory Information System (LIS) in a timely manner to meet the deadline for the first quarter 2011 data submission of June 30, 2011. This may require manual abstraction which will be both time consuming and costly. It will, in all probability, take 6 to 9 months to have a fully operational interface and there will be costs associated with that for the health system.
- The MHS facilities would prefer to submit the worst laboratory value data, which is consistent with PHC4's current requirement.
- MHS facilities are agreeable to submit laboratory value data for the conditions currently reported in the PHC4 *Hospital Performance Report* and Mercy Fitzgerald Hospital facility is reporting on cardiac surgery cases. They are satisfied with their current process for submitting the additional clinical data for those cases.

Mercy Health System is working toward the implementation of an electronic health record but it will not be in place to meet the deadline for PHC4.

Respectfully submitted,  
Jeffry Komins M.D.  
CMO  
Mercy Health System

cc: HAP