MOUNT NITTANY
MEDICAL CENTER

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April 19, 2010

In reply to: 30-Day Public Comment Period for Continued Collection of Lab Data

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

Dear Joseph Martin, Executive Director:
Thank you for soliciting information from our facility in regards to using the lab data for risk adjustment outcomes. We have made some comments on your particular questions:

1. ***What file format should PHC4 establish for the submission of the lab data to the Council?*** A flat file with clear specific defined columns – such information as defined by your current PA Uniform Claims and Billing Form Reporting Manual for the UB-04 data reporting.

2. ***What are the issues the Council should consider in collecting the lab data directly or through a third-party vendor?*** A "Portal" would be excellent so that we could get the data back for reporting as well as creating a comparative with ability to generate date range specific comparative information.

3. ***What are the potential issues, including increased or decreased costs, for hospitals in manually abstracting or electronically downloading selected lab data for submission to PHC4?*** No comment

4. ***Are there any issues for providers regarding the submission of lab data for selected conditions that are including in the PHC4 public reports?*** How would the Council standardize for the various types of hospitals?

5. ***What are the issues to consider regarding the submission of the first or the worst lab values for selected lab tests administered early in the patient stay?*** Clarity is needed here, if hospital must select worst lab – How do we determine this?

6. ***What are the issues to consider in using the first or the worst lab values for the selected lab tests administered early in the patient stay for the purposes of risk adjusting the data?*** No comment

7. ***What are the potential options to consider in continuing to collect clinical data beyond the lab data for the cardiac surgery cases included in the Council's Cardiac Surgery in PA Report?*** Unknown, our facility does not currently perform cardiac surgeries.

Respectfully,

Amy Powers, Clinical Data Coordinator
Health Information Management
Mount Nittany Medical Center