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Joe Martin, Executive Director
Pennsylvania Health Care Cost Containment Council
225 Market Street
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Harrisburg, PA

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Dear Mr. Martin:

Below are comments from the Robert Packer Hospital related to the proposed changes to PHC4 data submission.

- What file format should PHC4 establish for the submission of lab data to the Council?
Response: A fixed length flat file
- What are the issues that the Council should consider in collecting lab data directly or through a third - party vendor?
Response: Consider cost, consistent format, HIPPA
- 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?
Response: Manual abstraction will result in increased cost and FTEs, Electronic submission should not have barriers as long as the format setup is consistent. May experience some issues connecting lab values with Discharge diagnosis since our current system uses Admission diagnosis.
- Are there any issues for providers regarding the submission of lab data for selected conditions that are included in PHC4 public reporting
Response: Validity of risk adjustment.
For electronic submission reference ranges are needed since there lab value ranges differ by facility and instrumentation
- What are the issues to consider regarding submission of the first or the worst lab values for selected lab tests administered early in the patient stay.
Response: We currently only submit lab values for Day 1 and 2 for Open Hearts except for Preadmission labs which cover 180 days. Will this impact risk adjustment validity?

- What are the issues to consider regarding submission of the first or the worst lab values for selected lab tests administered early in the patient stay for the purposes of risk adjusting the data?.

Response: Validity of risk adjustment.

- 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 Pennsylvania Report*?

Response: Cost for both data abstraction and to maintain system to support data collection. Since many organizations now support the STS database this is duplication. How many consumers access and use the PHC4 reports?

Thank you for allowing us the opportunity to comments on the proposed changes.

Respectfully,

Arlene Lantz, MS, BSN, RN, NEC-BC
Manager Quality & Outcomes