



August 25, 2015

Andrew Slavitt
Acting Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1461-P
P.O. Box 8013
Baltimore, MD 21244-8013

Re: National Hospital Inpatient Quality Measures: Sepsis Bundle Project Performance Measure

Dear Mr. Slavitt:

On behalf of our member hospitals, we are writing to ask you to suspend implementation of the Severe Sepsis and Septic Shock Management Bundle measure that has been adopted for the Hospital Inpatient Quality Reporting Program beginning Oct. 1, 2015.

The Infectious Disease Society of America (IDSA) represents nearly all of the nation's leading experts on infectious diseases and their treatments. As IDSA clearly articulated in its letter to you on this same subject, this measure, as currently written, encourages the overuse of broad spectrum antibiotics. We recognize that severe sepsis and septic shock is highly dangerous for the patient. It would be easier for hospitals to just treat all of these patients with broad spectrum antibiotics, as the measure indicates we should. However, the Centers for Disease Control and Prevention (CDC) and the White House Summit on Antibiotic Stewardship urged good stewardship of antibiotics, particularly broad spectrum antibiotics, if we are to preserve their effectiveness against bacterial infections in the patients we will see next week, next month and next year. By encouraging the use of broad spectrum antibiotics when more targeted ones will suffice, this measure promotes the overuse of the antibiotics that are our last line of defense against drug-resistant bacteria.

We are proud to be working with CDC to promote effective antibiotic stewardship. We are deeply concerned that the Centers for Medicare & Medicaid Services would require public accountability for performance on a measure that runs counter to the tenets of effective antimicrobial stewardship and is so overly complex and burdensome that it hampers the ability of hospitals to appropriately evaluate their performance on management of Severe Sepsis and Septic Shock.

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We urge you to suspend this measure and direct the measure development team to refine its specifications so that they are consistent with the tenets of antimicrobial stewardship before reintroducing it into the Inpatient Quality Reporting Program. Our members and the infectious disease experts on their staffs would be delighted to work with you in crafting these changes if that would be helpful.

Please feel free to contact Nancy Foster, AHA vice president for quality and patient safety policy, at (202) 626-2337 or nfoster@aha.org if you have questions or would like some assistance in re-tooling the measure.

Sincerely,

American Hospital Association
America's Essential Hospitals
Association of American Medical Colleges
Federation of American Hospitals

CC: Patrick Conway, M.D.
Kate Goodrich, M.D.