



Leaders in Applied Public Health Epidemiology

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www.cste.org

CSTE is an organization that supports epidemiologists practicing at the state, territorial, tribal, and local levels.

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June 5, 2008

William B. Munier, MD Director,
Center for Quality Improvement and Patient Safety
Agency for Healthcare Research and Quality
540 Gaither Road
Rockville, MD 20850

RE: Patient Safety and Quality Improvement: Proposed Rule

Dear Dr. Munier,

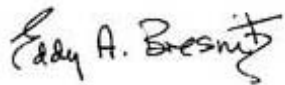
The Council of State and Territorial Epidemiologists (CSTE) has read with interest the proposed rule for patient safety and quality improvement. CSTE is an organization of Member States and also a professional association with over 1,150 public health epidemiologists working in all 50 states as well as local, tribal, and territorial health agencies to detect, prevent and control conditions that impact the public's health. CSTE's members possess expertise in surveillance and epidemiology in a broad range of areas, including communicable diseases, immunization, environmental health, chronic diseases, occupational health, injury control, maternal and child health and oral health. We share AHRQ's commitment to patient safety and quality improvement. The proposed patient safety organizations (PSOs) have the potential to achieve that goal.

A major concern that our members have is that the proposed PSOs should be truly complementary and not competitive with other voluntary or regulatory requirements. CSTE has long championed integration of systems, rather than development of separate programs that attempt to define one aspect of the complex web of public health practice. In addition, CSTE supports the strict adherence to standards to facilitate information exchange. CSTE strongly supports public health messaging using Public Health Information Network (PHIN) compliant standards, standard vocabulary and adherence to the American Health Information Community (AHIC) use cases.

CSTE absolutely understands the need for healthcare professionals and institutions to report adverse events to health departments. There are many adverse patient events that should be notified immediately to State health departments so that appropriate actions can be taken to protect the public's health. Recent examples include: unsafe injection practices at an endoscopy clinic in Nevada, tainted heparin that resulted in anaphylactoid reactions and some deaths, bacterial contamination of heparin and alcohol-free mouthwash with *Serratia* spp. and *Burkholderia cepacia*, respectively.

As CSTE is committed to improving patient safety, we respectfully suggest that the rule allows for the release of the patient safety work product to public health departments so that preventive measures may be taken in a timely manner." The current proposal allows for disclosure of the patient safety work product to the Food and Drug Administration, but not to State and local health departments. If you have any additional questions or concerns, please feel free to contact Marion Kainer at (615) 741-7247 or marion.kainer@state.tn.us.

Sincerely,

A handwritten signature in black ink that reads "Eddy A. Bresnitz". The signature is written in a cursive, slightly slanted style.

Eddy Bresnitz, MD, MS
President

cc Pat McConnon
Marion Kainer
Jeff Engel
Richard Hopkins