



SAN ANTONIO COMMUNITY HOSPITAL

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As a Joint Commission accredited Stroke Center we thank you for the opportunity to respond to the stroke data reported in the Hospital Inpatient Mortality Indicators for California 2012. While we appreciate OSHPD's efforts to provide an outcome based data collection, we have concerns on how this information will be presented to the public.

After reviewing the OSHPD Technical Note for Producing AHRQ Inpatient Mortality Indicators 2012 Data, we identified that there is no consideration for patients who have requested "do not resuscitate" (DNR) or terminal extubation at the time of admission due to the severe nature of their neurological condition. In our review of all patient records chosen for the report, we found that 73% (38 out of 52) of cases presented to our emergency room with terminal neurologic conditions with DNR or terminal extubation requested by the family. If these variables were included within the selected risk adjustment models, this would very likely have significantly influenced our mortality rate.

Also, in reviewing your 2012 mortality report the public will have no information that enumerates the caveats listed in your technical notes such as:

- Medical record data for the reported medical conditions have not been validated through medical record abstraction to demonstrate severity of illness and complications are accurately coded across all hospitals.
- OSHPD has not performed analyses to establish that the risk models for these medical conditions perform well compared to gold-standard clinical models that include information such as laboratory values, vital signs, and imaging studies.
- Because these indicators use inpatient mortality as the outcome of interest, hospitals that are less likely to transfer patients post-treatment may appear to perform worse (San Antonio Community Hospital is a stroke center and rarely transfers patients out).

We look forward to continued participation with the AHRQ Mortality Reports along with stroke center benchmark efforts developed by The Joint Commission.

Sincerely,

Dr. Mario Lopez-Luna
Dir. Quality Management