



December 22, 2009

Kathleen Sebelius Office of the Secretary U.S. Department of Health and Human Services 200 Independence Avenue, SW Washington, DC 20201

### Dear Secretary Sebelius:

The Association for Professionals in Infection Control and Epidemiology (APIC) and the Society for Healthcare Epidemiology (SHEA) wish to thank you for the opportunity to provide comment on Healthy People 2020 Objectives for Healthcare-Associated Infections (HAI)

#### New Topic Area-Healthcare Associated Infections

APIC and SHEA support grouping the healthcare-associated infection objectives in their own topic area. We believe this highlights the importance of these objectives, and calls attention to the expanding need to address these infections as part of the Healthy People 2020 goal of improving the health of all Americans.

We also agree with the coordination of these objectives with the metrics and 5-year reduction targets outlined in the HHS Action Plan to Prevent Healthcare-Associated Infections. It is important that national alignment of metrics and targets is achieved in order to best direct resources and improvement efforts. APIC and SHEA also welcome the opportunity to work with HHS to provide feedback and updates as warranted.

#### Comments on Objectives

APIC and SHEA agree on the continued inclusion of central line-associated bloodstream infections. We also support the addition of the new objective of reducing the incidence of invasive methicillin-resistant Staphyloccocus aureus (MRSA) infections. We applaud the use of the Centers for Disease Control and Prevention (CDC) as a data source for both of these proposed objectives, in order to use a national database as a standard for measurement development, supporting appropriate direction of resources and improvement efforts.

We suggest that the MRSA reduction objective specifically include both healthcare-associated and community-associated MRSA. Notable improvement in MRSA infection rates must include reduction efforts in all settings, including acute care, dialysis centers, outpatient treatment centers, extended care settings, and the community in general.

Additionally, APIC and SHEA would support and encourage the future development of objectives within the HAI topic area related to increasing compliance with healthcare personnel influenza vaccination recommendations.

In closing, APIC and SHEA strongly support highlighting efforts to eliminate HAIs as part of national health promotion and disease prevention objectives by inclusion of a topic area dedicated to this issue in Healthy People 2020. We appreciate the opportunity to provide comments, and we look forward to continuing our collaboration with HHS.

Sincerely,

Christine Nutty, RN, MSN, CIC

Christine Nully RN

2009 APIC President

Mark E. Rupp, MD **SHEA President** 

## **About Our Organizations:**

## Association for Professionals in Infection Control and Epidemiology (APIC)

APIC's mission is to improve health and patient safety by reducing risks of infection and other adverse outcomes. The Association's more than 13,000 members direct infection prevention programs that save lives and improve the bottom line for hospitals and other healthcare facilities around the globe. APIC strives to promote a culture within healthcare where targeting zero healthcare-associated infections is fully embraced. The organization advances its mission through education, research, collaboration, practice guidance, public policy and credentialing.

# The Society for Healthcare Epidemiology of America (SHEA)

The Society for Healthcare Epidemiology of America (SHEA) was founded in 1980 to advance the application of the science of healthcare epidemiology. SHEA comprises 1,700 physicians, infection control practitioners, and other healthcare professionals who are dedicated to maintaining the utmost quality of patient care and healthcare worker safety in all healthcare settings. The Society continually strives toward better patient outcomes by applying epidemiologic principles and prevention strategies to healthcare-associated infections and a wide range of quality-of-care issues. SHEA achieves its mission through education, research, evidence-based guidance development, and public policy.