



January 20, 2012

Ms. Lauren Lentine  
Senior Research Associate, Standards and Survey Methods  
Division of Healthcare Quality Evaluation  
The Joint Commission  
One Renaissance Boulevard  
Oakbrook Terrace, IL 60181

Dear Ms. Lentine:

The American Association for Clinical Chemistry (AACC) appreciates the opportunity to comment on the proposed National Patient Safety Goal for 2012, NPSG.16.01.01, “Minimize the overuse of tests, treatments, and procedures to reduce the risk of patient harm.” We agree that hospitals (and other health care providers) should routinely evaluate the services they provide to ensure they are scientifically valid and appropriately utilized. AACC believes that NSPG.16.01.01 can play an important role in accomplishing this objective.

The inappropriate utilization of certain laboratory tests is a key issue that needs to be addressed by the health care community. Ordering an unnecessary test, at a minimum, wastes limited health care resources, while in a worse case scenario can generate data that may result in an unnecessary medical intervention that harms the patient. AACC strongly supports efforts to generate the scientific evidence to assist clinicians and other health care professionals to select the appropriate test(s) for each individual and situation.

AACC is an active participant in the evidence-based arena focusing on optimal and appropriate utilization of diagnostic tests. The Association has worked closely with the Agency for Health Care Research and Quality—the leading government agency involved in evidence-based research—on more than a dozen systematic reviews. These reviews have examined existing evidence in support of new tests for diagnosing and monitoring certain health conditions, including diabetes and cardiac disease, as well as identifying evidence ‘gaps’ warranting further research. Further, our scientific academy, the National Academy on Clinical Biochemistry, has published more than ten practice guidelines over the past decade to assist clinicians in test selection.

As the Joint Commission continues to move forward in this area, we recommend that the Commission consider additional goals, such as:

- **Ensuring compliance with scientifically and clinically valid testing recommendations**

Although AACC strongly supports reducing unwarranted testing, we also believe that hospitals and other health care providers should strive to ensure that patients receive recommended testing by such entities as the United States Preventive Services Task Force and reputable professional societies. A 2009 Lewin Report, "*The Value of Laboratory Screening and Diagnostic Tests for Prevention and Health Care Improvement*," reported that "only 62% of recommended laboratory and radiology tests were provided for preventive, acute, and chronic care."<sup>1</sup> The absence of appropriate testing, as well as the overuse of testing, can lead to poor patient outcomes.

- **Evaluating current test menu and replace antiquated tests with newer, improved tests that can lead to improvements in patient care**

AACC believes that laboratory directors should review their test menu and, in conjunction with clinicians and other health care professionals, remove tests that do not provide clinical value. We believe that replacing older, out of date tests with more accurate and improved ones can lead to more timely diagnoses and treatment, improvements in patient care, and reduce hospital and insurer costs. (For example, new analytes such as troponin have replaced creatine Kinase-MB and myoglobin for assessing myocardial infarction.<sup>2</sup>)

By way of background, AACC is the principal association of professional laboratory scientists--including MDs, PhDs and medical technologists. AACC's members develop and use chemical concepts, procedures, techniques and instrumentation in health-related investigations and work in hospitals, independent laboratories and the diagnostics industry worldwide. The AACC provides international leadership in advancing the practice and profession of clinical laboratory science and its application to health care. If you have any questions, please call me at (804) 828-0375, or Vince Stine, PhD, Director, Government Affairs, at (202) 835-8721.

Sincerely,



Greg Miller, PhD  
President, AACC

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<sup>1</sup> [http://www.labresultsforlife.org/briefing/Lewin\\_ACLA\\_Value\\_of\\_Lab\\_Sx\\_Dx\\_Report.pdf](http://www.labresultsforlife.org/briefing/Lewin_ACLA_Value_of_Lab_Sx_Dx_Report.pdf)

<sup>2</sup> (Am J Manag Care. 2010;16(9):e220-e227)