

October 14, 2015

Andy Slavitt
Acting Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: Medicare and Medicaid Programs: Reform of Requirements for Long-Term Care Facilities
[CMS- 3260-P]

Dear Mr. Slavitt:

We, the undersigned organizations representing healthcare providers, physicians, and public health, are deeply concerned about the growing public health threat of antibiotic resistance. We therefore write in strong support of the antibiotic stewardship provisions in the Center for Medicare and Medicaid Services' (CMS's) proposed rule revising the requirements long term care facilities (LTCFs) must meet to participate in Medicare and Medicaid programs.

All antibiotic use contributes to resistance. It is therefore critical that these life-saving medications are used judiciously, and that inappropriate or unnecessary use of antibiotics is eliminated. The Centers for Disease Control and Prevention estimates that antibiotic-resistant bacteria infect two million people each year in the United States, and cause 23,000 deaths.¹ Long term care facility (LTCF) residents are a vulnerable population, and antibiotic-resistant infections are more likely to spread amongst members of this group as they tend to be elderly and live in close quarters with one another. Antibiotic-resistant infections are on the rise in LTCFs, and a significant number of antibiotics prescribed in these facilities are inappropriate or unnecessary.

There is wide consensus that infection prevention programs in long term care facilities should include an antibiotic stewardship component,²⁻⁴ as antibiotics are the most frequently prescribed medications in LTCFs.⁵ Broadening requirements of LTCF's infection prevention and control programs to incorporate antibiotic stewardship programs (ASPs) that include both antibiotic use protocols and a system to monitor antibiotic use would allow facilities to optimize antibiotic use, combat the rise of resistant infections, and avoid antibiotic-related adverse outcomes for all residents.

¹ Centers for Disease Control and Prevention, "Antibiotic Resistance Threats in the United States, 2013," (July 21, 2015), <http://www.cdc.gov/drugresistance/pdf/ar-threats-2013-508.pdf>.

² Phillip W. Smith et al., "SHEA/APIC Guideline: Infection Prevention and Control in the Long-term Care Facility," *American Journal of Infection Control* 36, no. 7 (2008):504-535, doi: 10.1016/j.ajic.2008.06.001.

³ Infection Control Today. "IDSA Supports Proposed Stewardship Requirement for Long-term Care, Touts ID Physician Leadership," (July 16, 2015), <http://www.infectioncontrolday.com/news/2015/07/idsa-supports-proposed-stewardship-requirement-for-long-term-care-touts-id-physician-leadership.aspx>.

⁴ Jane Siegel et al., "Management of Multidrug-resistant Organisms in Healthcare Settings, 2006," *Health Care Infection Control Practices Advisory Committee*, (Accessed July 21, 2015), <http://www.cdc.gov/hicpac/pdf/MDRO/MDROGuideline2006.pdf>.

⁵ Centers for Disease Control and Prevention, "Get Smart for Healthcare. Antibiotic use in nursing homes." (Accessed August 20, 2015), <http://www.cdc.gov/getsmart/healthcare/learn-from-others/factsheets/nursing-homes.html>.

We are encouraged that CMS has recognized the importance of antibiotic stewardship in LTCFs, and urge the agency to include an antibiotic stewardship program requirement in the final version of its rule.

Sincerely,

ORGANIZATIONS

Consumers Union
Infectious Disease Society of America
Alliance for Aging Research
Association of State and Territorial Health Officials
Making a Difference in Infectious Diseases
Trust for America's Health
Cempra
The Peggy Lillis Foundation
American Public Health Association
Society of Infectious Disease Pharmacists
Council of State and Territorial Epidemiologists
Michigan Antibiotic Resistance Reduction Coalition
Alliance for the Prudent Use of Antibiotics
Association for Professionals in Infection Control and Epidemiology
Kaiser Permanente
School Food FOCUS
Intermountain Healthcare
The Society of Critical Care Medicine
Health Watch USA
National Association of County and City Health Officials
Stop TB USA
American Academy of Pediatrics
Society of Hospital Medicine
The Pew Charitable Trusts

INDIVIDUALS

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