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December 21, 2017

Don Wright, MD, MPH
Deputy Assistant Secretary for Health
Office of Disease Prevention and Health Promotion
Attn: Division of Health Care Quality
U.S. Department of Health and Human Services
1101 Wootton Parkway, Suite LL100
Rockville, MD 20852

Re: Phase Four of the National Action Plan to Prevent Health Care-Associated Infections: Road Map to Elimination; Coordination Among Federal Partners to Leverage HAI Prevention and Antibiotic Stewardship

Dear Dr. Wright:

The Association for Professionals in Infection Control and Epidemiology (APIC) wishes to thank the Department of Health and Human Services (HHS) for the opportunity to provide input into Phase Four of the *National Action Plan to Prevent Health Care-Associated Infections: Road Map to Elimination (HAI Action Plan)*. APIC is a nonprofit, multidisciplinary organization representing over 15,000 infection preventionists whose mission is to create a safer world through prevention of infection. We commend HHS for adding a new phase to the HAI Action Plan that addresses the interconnected relationship between HAIs, antibiotic use, and antibiotic resistance.

As developers and implementers of many of the programs, resources, and interventions to prevent healthcare-associated infections, we appreciate the reaffirmation of the federal commitment to improving health outcomes through the elimination of HAIs. The components of the *HAI Action Plan* support the APIC mission of "Creating a safer world through prevention of infection." While the intent of Phase Four of the *HAI Action Plan* is to demonstrate how the work of federal agencies complement each other in antimicrobial stewardship efforts, explain the role antibiotic resistance plays in HAIs, and set the course for future efforts, we feel the *HAI Action Plan* lacks detail to "point the way".

Goal 1. Slow the Emergence of Resistant Bacteria and Prevent the Spread of Resistant Infections of the *National Action Plan for Combating Antibiotic-Resistant Bacteria (CARB Action Plan)* clearly describes the objectives and sub-objectives aimed at accomplishing the goal; however, more than two and one-half years have passed since the *CARB Action Plan* was released. Progress towards controlling the unnecessary use of antibiotics and transmission of multidrug-resistant organisms has been made during that time. To more efficiently achieve the 2020 deadline, it is helpful to know and appreciate that there are interagency efforts underway. However, it is essential that infection preventionists and all providers working to improve antibiotic stewardship have a better understanding of the current gaps in implementation. Only then will the way forward be clear.



To move forward and accomplish this important public health initiative, we recommend an assessment of the objectives to identify those that have been completed, the progress to date for those where efforts have been initiated but not completed, and those objectives that have not seen any movement. Federal partner coordination and collaboration cannot lead to success without this analysis.

APIC appreciates the continued opportunity to provide input in HHS HAI initiatives and we applaud the agency's commitment to making care safer. Our members are dedicated to improving patient safety and promoting antibiotic stewardship. We look forward to continuing to work with HHS and other federal agencies to prevent HAIs and antibiotic resistance.

Sincerely,

A handwritten signature in black ink that reads "Linda R. Greene". The signature is written in a cursive, flowing style.

Linda R. Greene, RN, MPS, CIC, FAPIC
2017 APIC President