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American Nephrology Nurses' Association

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Dr. Gallagher:

ANNA is a professional nursing organization of more than 12,000 registered nurses practicing in nephrology. ANNA members are intimately involved in the supervision and delivery of care to adults and children with kidney disease. Our members work in a variety of settings including dialysis facilities, transplant centers, Chronic Kidney Disease (CKD) clinics, acute care, ambulatory clinics, and long term care. ANNA's purpose is to advance nephrology nursing practice and positively influence outcomes for patients with kidney disease through advocacy, scholarship, and excellence.

Thank you for the opportunity to respond to The Joint Commission's (TJC) potential new National Patient Safety Goals, Requirements and Implementation Expectations being considered for 2009. ANNA's Hemodialysis, Acute Care, Transplant and Advanced Practice Special Interest Groups and our Professional Practice Committee reviewed the proposed goals.

Summary of the comments:

Goal 7D Catheter Infections includes recommendations for disinfection of catheter hubs. However, there is no reference to care of the exit site. ANNA suggests TJC also include guidelines/protocols for exit site care.

Goals 7D Catheter Infections. We concur that use of the femoral vein ought to be avoided. However, there are situations where it is necessary for the femoral vein to be accessed for hemodialysis. ANNA suggests that TJC include a recommendation for the maximum length of time a catheter may remain in the femoral vein and stipulate that a patient may not be discharged from the facility with a femoral catheter in place. ANNA also suggests that a reference be made to the Kidney Disease Outcomes Quality Initiative (KDOQI) guidelines on the use and timelines for central venous catheter lines for hemodialysis, including the use of temporary non-cuffed catheters.

Goal 8 Medication Reconciliation is comprehensive and ANNA applauds TJC on the clarification provided.

I want to again thank you for the opportunity to participate in the review of The Joint Commission's potential new National Patient Safety Goals, Requirements and Implementation Expectations being considered for 2009. If you have any questions, or if we can be of assistance to you on kidney disease or related matters, please do not hesitate to contact me.

Sincerely,

Sandra Bodin, MA, RN, CNN
President

cc: Board of Directors