Final Version of the Health IT Patient Safety Action and Surveillance Plan Published: Impact for Patient Safety Organizations (PSOs)

On July 2, 2013, the Office of the National Coordinator for Health Information Technology (ONC) released, on behalf of Health and Human Services (HHS), the final version of the *Health Information Technology Patient Safety Action and Surveillance Plan* ("Health IT Safety Plan" or "the Plan").

By way of background, in 2011, the Institute of Medicine (IOM) issued a report entitled *Health IT and Patient Safety: Building Safer Systems for Better Care*, upon which the current Health IT Safety Plan builds and provides guidance on how to make care safer going forward, including such efforts by patient safety organizations (PSOs). The initial report opined that "[b]ecause health IT is so tightly integrated into care delivery today, the extent to which health IT may have caused or contributed to medical errors is often unclear."[1] The Plan notes that since the passage of the HITECH Act in 2009, there has been much greater utilization of electronic health records (EHR) and as EHR adoption becomes more widespread, the incidence of health IT-related harm may increase, but will likely also provide an opportunity to improve patient safety. [2]

In sum, the ONC provides two fundamental objectives for this Plan: "(1) to promote the health care industry's use of health IT to make care safer; and (2) to continuously improve the safety of health IT."[3] The ONC also states that:

> the Plan leverages existing authorities to strengthen patient safety efforts across government programs and the private sector – including health care providers, health IT developers, patient safety organizations, and accrediting and oversight bodies. The Plan also identifies specific strategies and actions for increasing knowledge about the impact of health IT on patient safety and using that knowledge to improve the safety of health IT and patient care.[4]

The Agency for Healthcare Research and Quality (AHRQ), the entity which certifies and monitors PSOs, has indicated, that as a result of the Health IT Safety Plan, it will be collaborating with PSOs to add an additional focus of health IT to the PSOs' collection, aggregation and analysis of adverse event reports, as well as providing guidance to PSOs on how they can work with EHR developers to identify health IT risks.

Likewise, the ONC has stated that AHRQ will also update its Common Formats, which many hospitals and other providers use to report information to a PSO, so that the Common Formats are in line with the Health IT Safety Plan and make it easier to record and report information about health IT-related events and hazards to PSOs.[5] In addition,

> HHS will assist PSOs to improve the range and consistency of health IT safety data that they collect, as well as the ability of PSOs to use this data to identify, analyze, and mitigate IT-related events and hazards. HHS will also assist PSOs to de-identify and share this data, in compliance with applicable laws, so that it can be aggregated and used to analyze national health IT patient safety risks and trends.[6]

Partly as a result of this Plan, CMS is also going to encourage the use of Common Formats in hospital incident reporting programs, and is

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[1] Health IT Safety Plan, p. 5.
[2] *Id.*
[3] See ONC Fact Sheet: Health Information Technology Patient Safety Action and Surveillance Plan.
[4] *Id.*
[5] *Id., p. 2.*
[6] Health IT Safety Plan, p. 12, number 2.

educating its state survey agencies and surveyors to look for the use of Common Formats in the hospitals they visit.[7] Thus, while the use of Common Formats has been and remains voluntary for PSOs to date, the push to encourage their use is increasing.

The complete Health IT Safety Plan can be found at http://www.healthit.gov/sites/default/files/safety_plan_master.pdf

In addition to assisting with incorporation of the Health IT Safety Plan, the attorneys at Hancock, Daniel, Johnson & Nagle, P.C. are available to assist with all aspects of PSO development, strategy, implementation and policies. If you have any questions about this update or any PSO related matters, please contact Molly Huffman at mhuffman@hdjn.com or Page Gravely at pgravely@hdjn.com. For telephone inquiries, please call Molly or Page at 804-967-9604.

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[7] *Id,* p. 13.

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