

December 20, 2023

Re: Public Comment to CMS Proposed Patient Safety Structural Measure. Number: MUC2023-188.

The Institute for Safe Medication Practices (ISMP), a global leader in patient safety as the first non-profit organization devoted entirely to preventing medication errors, would like to offer its enthusiastic support of the Patient Safety Structural Measure (PSSM) that is identified as part of the Centers for Medicare and Medicaid Services (CMS) 2023 Measures Under Consideration List informed by the Safer Together: The National Action Plan.

In our vision for quality healthcare, the reduction of all preventable harm related to medication use must be a key priority. Commitment to the ideals of safety and quality must be more than a vision - it must be a demonstrated reality. While the National Action Plan supports a fundamental redesign in this approach, we believe a PSSM will reinforce the need for organizations to take actionable steps and demonstrate their commitment to a reliable healthcare system, free from error and patient harm.

At our core, ISMP believes in and has promoted the use of a total system approach to the reduction of medication errors similar to what is called for in the proposed PSSM. The foundation of this approach involves organizational leadership and a culture of shared accountability for frontline staff (as called for in Domains 1 and 2). Since 2009, ISMP has educated healthcare professionals on the value of a medication safety strategic plan and the importance of an organizational infrastructure to support organizational reliability. Many organizations have engaged with ISMP through the use of our self assessments, guidelines for the implementation of safe practices, and biweekly ISMP Medication *Safety Alert!*[®] newsletters or Action Agendas to ensure that they are adopting safety practices and providing medication management in a proactive manner. While organizations are responsible for establishing systems of safety and coaching practitioners when at-risk behaviors are identified, we also believe that practitioners should be allowed to practice in an environment free from fear of punishment or legal retribution for human errors.

ISMP also supports the organizational adoption of automation and other high leverage strategies (Domain 3) including advanced integrated technologies such as computerized prescriber order entry (CPOE) and barcode point-of-care systems as essential tools in all areas of hospital practice to assist healthcare practitioners overcome some of the human factor challenges innate within our current systems. We strive to assist practitioners to use these technologies to their fullest safety potential to support error free care while working closely to manage the complexities that often accompany these systems.

Error reporting is crucial to patient safety, as outlined in Domain 4 of the PSSM. At the heart of ISMP's efforts and belief in a Just Culture model of shared accountability and transparency is the need for error reporting - ISMP runs the only national voluntary practitioner reporting programs for medication errors and vaccine errors. The learning and insights gained from the investigation and analysis of information through these programs allows ISMP to fulfill its mission worldwide as an early warning system for others to avoid preventable harm from medication use. ISMP's best practice recommendations, which are built upon system-based solutions, also are disseminated through: newsletters that reach more than a million readers; unique educational programs for foundational learning about medication safety; confidential consulting services for healthcare systems; and a

website for healthcare professionals (www.ismp.org) to provide access to free medication safety information, and alerts.

Domain 5 of the PSSM calls for engagement with patients, families, and caregivers. ISMP agrees that healthcare consumers should be empowered as partners in ensuring patient safety and need trustworthy resources related to medication use. To that end, ISMP offers a website specifically for consumers (www.consumermedsafety.org) that provides evidence-based education and tools. The website is designed to enhance collaboration and communication between patients and their healthcare providers and assist consumers in identifying potential safety issues. ISMP also runs a consumer medication error reporting program to help them take a more active role in preventing future errors.

As affiliate of ECRI and a listed Patient Safety Organization, ISMP is known and respected worldwide as the gold standard for medication safety information, and works closely with healthcare practitioners, healthcare organizations, professional organizations, regulatory agencies, and consumers to advance safe medication practices. ISMP believes strongly in the advancement of the five domains within the proposed statements and is in full support of the collaboration called for within the healthcare community on the attainment of these measures.

Respectfully,

Rita K. Jew, PharmD, MBA, BCPPS, FASHP

A handwritten signature in black ink, appearing to read 'Rita K. Jew', with a stylized flourish at the end.

President
Institute for Safe Medication Practices