



Comments on 2023 MUC Structural Measures

Washington Advocates for Patient Safety

Washington Advocates for Patient Safety (WAPS) appreciates this opportunity to comment on the 2023 structural measures currently under consideration by the Center for Medical Care and Medicaid Services. WAPS is a nonprofit organization and represents patients and family members who were harmed by medical errors. All of us with WAPS are highly motivated to promote healthcare quality and safety as well as public transparency and accountability.

As patient safety advocates who have personally experienced medical harm, we strongly support these two new structural measures on patient safety (MUC2023-188) and hospital commitment to improving care for elderly patient (MUC2023-196). It is time for the US to make zero harm as our national priority and goal in healthcare. All proposed five domains under the patient safety structural measure, i.e., leadership commitment, strategic planning and organizational policy, culture of safety and a learning system, accountability and transparency, and patient/family engagement, are all essential and critically important for improving patient safety and reducing patient harm.

Data have strongly suggested that public transparency and accountability drive healthcare improvement in patient safety. So, to ensure the patient safety structural measure not merely an attestation and to ensure healthcare accountable, we recommend that the CMS add an audit process to evaluate not just the implementation of these five patient safety domains but also their effectiveness in improving patient safety at individual hospitals.

In the same spirit of the 4th domain, Transparency and Accountability, we also recommend that the outcomes of the patient safety structural measure be included in the CMS Quality Reporting Program and make the attestation results publicly reported on the Hospital Compare website. We also recommend that the CMS either require hospitals or provide them with incentive on transparency by posting their attestations on the hospitals' websites, so that their patients and the public can be informed about and gain trust in their hospitals' efforts and progress in improving patient safety. This is a win-win situation for both the public and healthcare facilities.

Sincerely,

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