

January 26, 2023

Submitted electronically to: PSActionAlliance@AHRQ.hhs.gov

Dr. Robert Otto Valdez, PhD MHSA
Agency for Healthcare Research and Quality
5600 Fishers Lane
Rockville, MD 20857

Re: Request for Information on Creating a National Healthcare System Action Alliance To Advance Patient Safety (AHRQ_FRDOC_0001-0956)

Dear Dr. Valdez,

Vizient, Inc. appreciates the opportunity to respond to the Agency for Healthcare Research and Quality's (AHRQ's) Request for Information (RFI) on the Patient Safety Action Alliance (hereinafter "Action Alliance"). Vizient applauds AHRQ for prioritizing this important work and looks forward to continued engagement with the agency as its patient safety work evolves.

Background

Vizient, Inc. provides solutions and services that improve the delivery of high-value care by aligning cost, quality, and market performance for more than 60% of the nation's acute care providers, which includes 97% of the nation's academic medical centers, and more than 20% of ambulatory providers. Vizient provides expertise, analytics, and advisory services, as well as a contract portfolio that represents more than \$130 billion in annual purchasing volume, to improve patient outcomes and lower costs. Headquartered in Irving, Texas, Vizient has offices throughout the United States.

Recommendations

Vizient appreciates AHRQ's ongoing work to develop the Action Alliance, which will build on the core principles provided in [Safer Together: A National Action Plan to Advance Patient Safety](#).¹ Also, Vizient is engaged in a significant amount of patient safety work as an AHRQ-listed [Patient Safety Organization](#) (PSO). As AHRQ is aware,

¹ <https://www.ahrq.gov/cpi/about/otherwebsites/action-alliance.html>

PSOs can offer providers and hospitals the opportunity to work collaboratively to learn about top-of-mind issues in the field, compare data to measure performance, and work with peers to accelerate improvement. Given Vizient's role as a PSO, we look forward to learning more about membership in the Action Alliance so that we can broaden our efforts to share insights regarding patient safety. Also, in our comments, we respond to various questions provided in the RFI and encourage AHRQ to work closely with a range of stakeholders as the scope of the Action Alliance is refined.

Stakeholder Engagement

While initial information about the Action Alliance was shared in October 2022,² there is limited information about the Action Alliance available. For example, a charter or governance documents, recordings of meeting(s) and information regarding how stakeholders can join the Action Alliance would be helpful. Additionally, direct communication between AHRQ and providers and healthcare groups would help stakeholders identify more concrete recommendations in response to this RFI. Vizient encourages AHRQ to provide more specific information about the Action Alliance for stakeholder consideration.

Based on the information online, AHRQ seeks to convene a group to build on its existing core principles of culture, leadership, and governance; patient and family engagement; healthcare workforce safety; and a learning system. Vizient notes the importance of working with hospitals and providers to establish more effective processes after a sentinel event. Through our PSO, Vizient convened experts to [share insights](#) regarding empathetic and effective responses to sentinel events and Root Cause Analysis (RCA) consideration. For example, including all clinicians involved in the event in the RCA meetings, and facilitating real-time communication and support for the patient and family involved in an adverse event were opportunities Vizient's PSO identified. Vizient believes the work and perspective of PSOs and providers would be helpful to consider as the scope of the Action Alliance is determined. Vizient welcomes the opportunity to further discuss our PSO work with AHRQ and the Action Alliance.

How can the voluntary Action Alliance most effectively support healthcare delivery systems and other stakeholders in advancing patient and workforce safety? Are there specific priorities for different types of systems or setting of care? What stakeholders should be part of the Action Alliance to make it most effective?

Vizient applauds AHRQ for taking a key step to form the Action Alliance by convening a national group of stakeholders to address patient safety. Patient safety is a top priority

² <https://www.ahrq.gov/cpi/about/otherwebsites/action-alliance.html>

for Vizient, and we look forward to being able to support hospitals in their efforts with the added support of the Action Alliance.

As AHRQ launches this initiative, it should be aware of the work already being done in the field, as well as the collaboratives already in existence. Supporting and engaging with existing coalitions will give AHRQ the ability to enhance the work that is already being done, as opposed to reinventing the wheel with stakeholders. Further, Vizient encourages AHRQ to include hospitals and health systems in the Action Alliance, in addition to PSOs as noted above. Including providers' real-world experiences and perspectives should be a priority for any national initiative focused on patient safety. Vizient also encourages AHRQ to provide more direct communication with potential stakeholders. For example, AHRQ could convene stakeholders and gain input through webinars and listening sessions prior to finalizing any policies for the Action Alliance.

What are other national patient and workforce safety initiatives that the Action Alliance should be aware of and how can the Action Alliance best collaborate, coordinate, and avoid duplication with them?

As AHRQ is aware, PSOs support efforts to create a safe learning space for staff to share patient safety learnings and opportunities within their organization, across their system, and across the PSO membership. While AHRQ already maintains a [database](#) of PSOs that meet its standards for patient safety activities, we encourage AHRQ to consider how PSOs' work and membership can be included in the Action Alliance, and also where the Action Alliance can fill in gaps.

If membership cannot be granted to all interested providers, PSOs and other stakeholders, providing engagement opportunities throughout the process of the Action Alliance's work would help foster collaboration. This could also prevent duplication of efforts, provide an environment for learning, and allow AHRQ to build on work that is already happening. Vizient recommends that AHRQ consider directly contacting existing PSOs for feedback on the issues posed in this RFI and future work of the Action Alliance. Further, Vizient encourages AHRQ to consider extending the opportunity for membership in the Action Alliance to the AHRQ-listed PSOs.

How can the Action Alliance best support healthcare systems in advancing healthcare equity within their patient and workforce safety efforts, including through redesign of care delivery?

Many hospitals, providers, and healthcare groups are addressing the important issues related to health equity in their communities, including through patient safety work. Some common issues that arise in addressing health inequities include issues with data collection and connection to and communication with other providers and community-based organizations, if available. Vizient is working across its units to integrate [health equity](#) into the work we do and encourages our hospitals and providers to do the same. While various efforts are underway to support healthcare systems in advancing health equity efforts, we encourage AHRQ to clarify potential options for the Action Alliance to provide support. For example, it is unclear if additional funding options may be available or whether the Action Alliance would focus on the sharing of best practices. Additional

information about the scope of the Action Alliance will help better inform our response to this question.

Conclusion

Vizient appreciates AHRQ's effort to gain additional feedback regarding patient safety. Vizient membership includes a variety of hospitals ranging from independent, community-based hospitals to large, integrated health care systems that serve acute and non-acute care needs. In closing, on behalf of Vizient, I would like to thank AHRQ for providing the opportunity to provide feedback on the Patient Safety Action Alliance. Please feel free to contact me, or Emily Jones at Emily.Jones@vizientinc.com, if you have any questions or if Vizient may provide any assistance as you consider these recommendations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Shoshana Krilow". The signature is fluid and cursive, with a large initial "S" and a long, sweeping tail.

Shoshana Krilow
Senior Vice President, Public Policy and Government Relations
Vizient, Inc.