Working With a PSO: One Approach

Patient Safety and Quality Information

Information Triage by Provider

Information Eligible to Become PSWP
- Could improve safety, quality, or outcomes of health care,
- Assembled or developed solely for reporting to PSO (not for other purposes)

Provider PSES
- Date and document incoming information upon entry
- Analyze or deliberate (protected without reporting to PSO) (3)
- Option: Remove incoming information before it is reported to the PSO and then use it for another purpose (4)
- Prepare and report incoming information to PSO

Feedback to provider by PSO is PSWP

PSO PSES
- Conduct all Patient Safety Activities required under the Act and Rule (6)
- Provide feedback and analysis to provider PSES
- Prepare data to submit to PSOPPC

PSOPPC

Nonidentifiable Patient Safety Event Data

NPSD

Information Not Eligible to Become PSWP (even though it could improve quality, safety, or outcomes of health care) (This information remains outside the Provider’s PSES)
- Excluded by definition of PSWP (1);
- Collected or developed for purposes other than reporting to a PSO, such as:
  - Corporate and external record-keeping requirements
  - Inspection, survey, or external reporting requirements (Federal or State)
  - Other business purposes, such as claims, etc.

Provider may enter a copy, but never the original, of “ineligible” information into its PSES (2)

Abbreviations
PSO = Patient Safety Organization
PSWP = Patient Safety Work Product
PSES = Patient Safety Evaluation System
PSOPPC = PSO Privacy Protection Center
NPSD = Network of Patient Safety Databases
Footnotes

1. Paragraph (2)(i) of the PSWP definition under the Patient Safety Rule (42 CFR §3.20) lists the types of information that are not eligible to become PSWP.

2. Never report to the PSO, as PSWP, originals of ineligible information. Only copies of ineligible information or information dropped out of the PSES can be reported to the PSO.

3. When analysis and deliberations are conducted in the PSES, PSWP protections will apply immediately; the drop-out provision does not apply.

4. The drop-out provision applies only to incoming information that has not yet been reported to a PSO. The provider must document the date and act of removing incoming information from the PSES.

5. The drop-out provision cannot be applied to information that has been actually or functionally reported.