



Michael D. Maves, MD, MBA, Executive Vice President, CEO

October 14, 2009

Carolyn M. Clancy, MD  
Director  
Agency for Healthcare Research and Quality  
Department of Health and Human Services  
540 Gaither Road, Suite 2000  
Rockville, MD 20850

**RE: Patient Safety Organization (PSO) Common Formats Version 1.0 for collecting and reporting patient safety information**

Dear Dr. Clancy:

The American Medical Association (AMA) appreciates the opportunity to submit comments on the Common Formats Version 1.0 (forms). We are submitting a general comment letter in lieu of submitting comments online given that our recommendations cover the content for all of the forms.

We commend the Agency for Healthcare Research and Quality (AHRQ) for incorporating advice received not only from its expert panel but also from health care professionals at the point of care. In general, the forms capture the understanding of the workflow at the point of care and the nuances associated with patient safety events. For example, we were pleased to see that the entire surgical episode of care from pre-anesthesia to surgery is covered in just one patient safety event form. We encourage AHRQ to continue to solicit and incorporate feedback from its expert panel, physicians, other potential reporters, as well as technical experts on patient safety reporting.

In addition, we recommend that AHRQ take into account the amount of time it may take to complete the patient safety event forms. AHRQ estimates that it could take up to twenty minutes to complete each report form. Ongoing refinement of the forms is necessary to ensure that they are useable and meaningful, and do not discourage reporting. Many reporters will need time to become familiar with the patient safety event forms and gain trust in the voluntary, confidential patient safety reporting system. We, therefore, continue to urge AHRQ and PSOs to accept the information provided on the forms as a complete submission and to find value in that submission rather than regarding it as an incomplete form.

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The AMA is committed to providing AHRQ with comments on a continuous basis in order to further enhance these forms. We also look forward to working with AHRQ on physician outreach and education initiatives and materials in order to maximize physician participation in patient safety event reporting. If you have any questions or need additional information, please do not hesitate to contact Carol Vargo, AMA's Assistant Director, Division of Federal Affairs, at 202-789-7492 or by email at [carol.vargo@ama-assn.org](mailto:carol.vargo@ama-assn.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Maves". The signature is written in a cursive, flowing style.

Michael D. Maves, MD, MBA