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January 26, 2023

Associate Director, Marquita Cullom  
Agency for Healthcare Research and Quality (AHRQ)  
Department of Health and Human Services (HHS)  
5600 Fishers Lane  
Rockville, MD 20857

RE: 2022-26897 – Request for Information on Creating a National Healthcare System Action Alliance to Advance Patient Safety; published at Vol. 87, No. 237 Federal Register 76046-76048 on December 12, 2022.

*Submitted electronically via [PSActionAlliance@AHRQ.hhs.gov](mailto:PSActionAlliance@AHRQ.hhs.gov)*

Dear Associate Director Cullom,

UnityPoint Health appreciates this opportunity to provide comments on this request of information (RFI) related to the development of a National Healthcare System Action Alliance to Advance Patient Safety. UnityPoint Health is one of the nation's most integrated health care systems. Through more than 32,000 employees and our relationships with more than 480 physician clinics, 40 hospitals in urban and rural communities and 14 home health agencies throughout our 9 regions, UnityPoint Health provides care throughout Iowa, central Illinois, and southern Wisconsin. On an annual basis, UnityPoint Health hospitals, clinics and home health agencies provide a full range of coordinated care to patients and families through more than 8.4 million patient visits.

UnityPoint Health appreciates the time and effort of AHRQ in developing this RFI and respectfully offers the following input on select questions.

## GENERAL COMMENTS

*In addition to specific RFI questions, CMS solicits comments on any additional information about how to make The Action Alliance most effective.*

**Comment:** UnityPoint Health believes that quality is our best strategy. Examples of this commitment and our renewed emphasis on patient safety include the roll out of our management system, daily tiered huddles, and an enterprise critical events review process.

On November 14, 2022, the Department of Health and Human Services (HHS) hosted an event to describe its plan to co-create with stakeholders a National Healthcare System Action Alliance to Advance Patient Safety (The Action Alliance). UnityPoint Health was pleased to be among the leading healthcare delivery organizations who attended this meeting in-person. The UnityPoint Health delegation included our Chief Clinical Officer, Chief Nursing Executive, and Chair of the Quality and Experience Committee of the

UnityPoint Health Board of Directors. We applaud HHS and the numerous federal agencies that were under one roof with stakeholders to collectively discuss a recommitment to patient safety. Secretary Becerra's remarks underscored that patient safety is a priority of the Biden Administration. The event topics were top-of-mind issues, the dialogue was substantive, and the engagement was energizing. We were very pleased that board members were specifically encouraged to attend and actively participate.

Although UnityPoint Health did participate and provide input during the November 14<sup>th</sup> event, we appreciate this opportunity to offer written input on select topics. Overall, **UnityPoint Health encourages swift action in the workplace violence space as this is imperative to maintaining a workforce and delivering quality care. The Action Alliance can provide the focus nationally, and hopefully make suggestions on how to reduce/eliminate the escalating issue. The Action Alliance should use its platform to gather innovative effective ideas and disseminate those actionable interventions to participating systems; a national sharing of best practices as it pertains to workplace violence.**

### **SPECIFIC REQUEST FOR INFORMATION (RFI) QUESTIONS**

- 6. What are the main challenges healthcare delivery systems and others are facing in meeting their commitments to advancing patient and healthcare worker safety as they emerge from the pandemic? Are there challenges that are specific to different types of systems, settings of care, or populations of people?*

**Comment:** Advancing patient and healthcare worker safety cannot be achieved without addressing workforce challenges. You cannot have safety if the foundation of healthcare – its workforce – is not resilient. A stable, educated and experienced workforce underpins safety. Yet workforce challenges in healthcare have been widely reported and impact healthcare delivery organizations. Staffing shortages that existed pre-pandemic have been exacerbated. Caregivers are burned out from the intensity and duration of the COVID-19 pandemic, leading many to retire early or completely change career paths. Still another segment of skilled professionals chose to leave their home base to become travelers, taking short-term positions. While staffing agency professionals are needed, the percentage of temporary staff during the pandemic ballooned with operational implications. There are simply not enough skilled professionals in the pipeline to meet needs and vacancies across the care continuum, and these positions require specialized training and ultimately time to develop knowledge and skills.

**UnityPoint Health would reiterate a top-of-mind workforce challenge identified by our Chief Clinical Officer at the November 14<sup>th</sup> event – workplace violence.** Generally, as the COVID-19 pandemic progressed, the crescendo of incivility experienced by our direct patient care providers and staff has been unprecedented. Verbal abuse is becoming commonplace, and incidents involving physical injuries to staff from patients are at an all-time high. As health care providers, the well-being of our patients is paramount; however, assuring the safety and well-being of our employees is at the forefront and must be balanced with patient care. As an integrated health system, this concern is universal across the care continuum impacting our hospitals, urgent care settings, clinics and home health services.

**The Action Alliance has the potential to advance safety by tackling workforce challenges from a national lens.** How can we revitalize healthcare professions to make them attractive again, and how can we restore value and respect to the industry? UnityPoint Health is engaging in small tests of change as well as

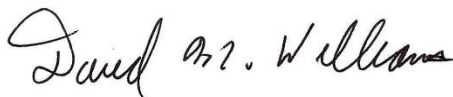
disruptive innovation to move the needle. **The Action Alliance is the opportunity to showcase best practices and lessons learned and to quickly disseminate these. UnityPoint Health is pleased to be part of the solution and we look forward to learning from others with the partnership and backing from HHS.**

1. *What can HHS bring to The Action Alliance in terms of coordination, alignment, tools, training, and other non-financial resources to support the effectiveness of The Action Alliance in assisting healthcare delivery systems and others in advancing patient and healthcare worker safety?*

**Comment: Meaningful data! UnityPoint Health encourages HHS to prioritize the sharing of transparent, timely and actionable data with healthcare delivery systems and providers.** Presently, data is delayed, so our ability to compare and trend data is backward looking and limits proactive interventions. For instance, in the workforce violence realm, there is a largely untapped opportunity to use geo-data in combination with direct patient care data to develop predictive models on aggression and/or agitation. Instead of being reactionary, data-based models examining the behavior escalation process can identify escalation pre-cursors to empower healthcare professionals to break or control the chain of events. Underpinning this paradigm change is access to real-time data by direct care providers without charging additional fees for such access.

We are pleased to provide input on this RFI and its impact on our health system, our patients, and communities served. To discuss our comments or for additional information on any of the addressed topics, please contact either Dr. David Williams, Chief Clinical Officer at [David.Williams@unitypoint.org](mailto:David.Williams@unitypoint.org) or 515-471-9227; or Dr. D'Andre Carpenter, Enterprise Chief Nurse Executive, Senior Vice President at [Dandre.Carpenter@unitypoint.org](mailto:Dandre.Carpenter@unitypoint.org) or 515-440-5110.

Sincerely,



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Chief Clinical Officer  
UnityPoint Health



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Enterprise Chief Nurse Executive, Senior Vice President  
UnityPoint Health



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