



ISHLT

A Society that Includes Basic Science, the Failing Heart, & Advanced Lung Disease

ISHLT Response to OPTN Standardize the Patient Safety Contact and Reduce Duplicate Reporting

The International Society for Heart and Lung Transplantation (ISHLT) appreciates the opportunity to comment on the policy proposal “Standardize the Patient Safety Contact and Reduce Duplicate Reporting.” Additional requirements for the Patient Safety Contact in the proposed policy appear reasonable, and it is prudent to require the addition of a secondary safety contact for occasions when the primary contact is unavailable.

Regarding the requirement of Patient Safety Contacts to be employed by the transplant programs, it is not clear that prohibiting third party employees from serving as the Patient Safety Contacts guarantees a prompt response to email communications. Primary employees may not respond promptly to emails. We suggest it may be acceptable to allow a third-party employee to serve in this role if the response time and communication stipulations are included in the service level agreement for that contract.

We recommend Patient Safety Contacts designate proxies to whom results can be reported. The OPTN should consider whether the Patient Safety Contact telephone number can be an "on call" number, which is rotated among various staff at the transplant center, and whether the email address can be a group email address, monitored by various staff.

Programs will be required by this policy to self-audit their primary and secondary contacts and make sure they are up to date every six months. We propose an electronic system enhancement to require update and review of Patient Safety Contacts at these intervals.

In the policy, it would be prudent to require transplant programs to immediately change the Patient Safety Contacts if the current contacts leave the institution or change roles to a non-transplant position.

Since they are the first to know when a patient becomes ill, it is logical to have transplant programs report recipient illness to the OPTN.

The monitoring plan overall appears feasible and sufficient.

ISHLT Level of Support: Support the Policy