

**Report on an Independent Review of the Safe  
Practices Section of the 2013 Leapfrog Hospital  
Survey and the CPOE Evaluation Tool**

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March 7, 2014



**JOHNS HOPKINS**  
M E D I C I N E

At the request of The Leapfrog Group, the Armstrong Institute for Patient Safety and Quality at Johns Hopkins Medicine has conducted an independent review of the Safe Practices section of the 2013 Leapfrog Hospital Survey and the CPOE Evaluation Tool to evaluate if either explicitly or implicitly endorses a specific commercial product.

The Leapfrog Group requested this review upon learning of a Justice Department ruling against the medical supply company CareFusion. In that ruling, the Justice Department alleges that CareFusion paid Dr. Charles Denham \$11 million to influence the endorsement of the National Quality Forum's Safe Practices for Better Healthcare, a set of safety practices identified by a national expert panel and co-chaired by Dr. Denham. The NQF Safe Practices serve as the basis for the Safe Practices section of the Leapfrog Hospital Survey. TMIT, an organization founded and chaired by Dr. Denham, updated the CPOE Evaluation Tool used on the Leapfrog Hospital Survey in 2010, at no cost to Leapfrog. In addition to his role at TMIT, Dr. Denham serves as the CEO of HCC Corporation, a business development accelerator. It is unclear with which, if any, additional companies or organizations Dr. Denham serves a formal role.

## **1. Methods for Review**

The Safe Practices section of the 2013 Leapfrog Hospital Survey and the CPOE Evaluation Tool were independently reviewed by Peter Pronovost, MD, PhD and Sean Berenholtz, MD, MHS, both members of the Johns Hopkins University School of Medicine faculty.

The review of the Safe Practices section of the 2013 Leapfrog Hospital Survey involved comparing the measures in the eight Safe Practices in the 2013 Survey to the text of the NQF Safe Practices for Better Healthcare – 2010 Update. Each measure within a practice was reviewed to determine if the measure explicitly or implicitly endorsed a specific commercial product.

The review of the CPOE Evaluation Tool involved reviewing each order set within the Tool and reviewing the overall logic of the Tool. Both were reviewed to determine if they explicitly or implicitly endorsed a specific commercial product.

## **2. Findings**

### ***Safe Practices Section of the 2013 Leapfrog Hospital Survey***

We found the Safe Practices section of the 2013 Leapfrog Hospital Survey, as worded, to closely reflect the text of the NQF Safe Practices for Better Healthcare – 2010 Update. The measures that comprise each Safe Practice have reasonable face validity. There is no mention of a specific commercial product or service in the Safe Practices section of The Leapfrog Survey.

As part of this review, we did triangulate the NQF Safe Practices with other organizations that have independently issued guidelines or support for hospital adoption of similar safety practices. A list of a few of these organizations is included in the following table:

<b>Safe Practice</b>	<b>Other Organizations Supporting Practice</b>
Leadership Structures and Systems	Institute of Medicine, The Joint Commission
Culture Measurement for performance	The Joint Commission, Agency for Healthcare Research and Quality
Teamwork Training	Institute of Medicine, Accreditation Council for Graduate Medical Education, Agency for Healthcare Research and Quality
Identification and Mitigation of Risks and Hazards	Agency for Healthcare Research and Quality, The Joint Commission
Nursing Workforce	American Nurses Credentialing Center, Robert Wood Johnson Foundation
Medication Reconciliation	The Joint Commission, American Society of Health-System Pharmacists
Hand Hygiene	Centers for Disease Control and Prevention, World Health Organization
Prevention of Ventilator Associated Complications	Centers for Disease Control and Prevention, Agency for Healthcare Research and Quality

As we are not aware of the full extent of services that Dr. Denham and his associated companies offer, it is difficult for us to identify all possible conflicts. And because we are not aware of all of the possible conflicts, it is difficult for us to make a definitive statement on the possible endorsement of commercial products. Given the support of these safety practices by other independent organizations however, the risk of conflict appears small.

## ***CPOE Tool***

The CPOE Tool is designed to test how well a hospital's implemented CPOE system flags providers to possible problem orders. CPOE systems that identify the problem orders are seen as being safer. The Agency for Healthcare Research and Quality (AHRQ) provided the initial funding for the Tool development and the initial order sets, with recent updates made to the orders themselves and not to the Tool logic.

We considered the possibilities that the Tool may promote specific medications or HIT solutions. Given that the focus of the Tool is on problem orders, this reduces the risk that the inclusion of specific medications, diseases, and the like in the order sets are included to promote a specific commercial product. In addition, hospitals do have the option in the Tool of indicating if a medication is not in their hospital's formulary, with no penalty to their overall score. The CPOE Tool does not advocate for neither specific medications nor specific HIT solutions.

Again, as we are not aware of the full extent of services that Dr. Denham and his associated companies offer, it is difficult for us to identify all possible conflicts. And because we are not aware of all of the possible conflicts, it is difficult for us to make a definitive statement on the possible endorsement of commercial products. Nevertheless, the risk of conflict based on the Tool's potential influence on hospital formulary or purchasing decisions for HIT solutions is small.

## **3. Conclusions**

After our independent review of the Safe Practices section of the 2013 Leapfrog Hospital Survey and the CPOE Evaluation Tool, we did not identify, based on the information known at this time, an explicit or implicit endorsement of a specific commercial product.

As we are not aware of the full extent of services that Dr. Denham and his associated companies offer, it is difficult for us to identify all possible conflicts. And because we are not aware of all of the possible conflicts, it is difficult for us to make a definitive statement on the possible endorsement of commercial products. Overall, the risk of conflict appears small given the information available at this time.