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New CMS Measure Aims to Advance Safety

*What must healthcare leaders know about
the new Patient Safety Structural Measure?*

The Centers for Medicare & Medicaid Services has introduced a new attestation-based measure—the Patient Safety Structural Measure—that reinforces practices to strengthen foundational elements associated with safe care. The measure is applicable to acute care hospitals that participate in CMS’ Hospital Inpatient Quality Reporting Program and the PPS-Exempt Cancer Hospital Quality Reporting Program. What must hospital leaders know, and how can they leverage existing safety strategies to prepare for this new measure?

Focus of the Patient Safety Structural Measure

While many quality measures reflect the performance and improvement of healthcare processes and outcomes, structural measures assess features of a healthcare organization that are relevant to its capacity to provide good care. The Patient Safety Structural Measure focuses on the environment of care and its related administrative processes and policies that are expected to make a significant impact on safety. This will enable hospitals to assess and attest whether they demonstrate a structure, culture and leadership commitment that prioritizes a systems-based approach to safety.

The new measure comprises five domains that reflect the most salient, evidence-based foundational areas deemed important for safety, as listed below. Its domains and activities are informed by *Safer Together: A National Action Plan to Advance Patient Safety*, developed by the 27 members of the National Steering Committee for Patient Safety convened by the Institute for Healthcare Improvement, including the American College of Healthcare Executives.

- 1. Leadership commitment to eliminating preventable harm:** Addresses the importance of senior leadership and the governing board setting the tone for commitment to patient safety and the essential leadership practices for safety.
- 2. Strategic planning and organizational policy:** Addresses how hospitals use their strategic planning cycles and internal policies to demonstrate a commitment to safety.
- 3. Culture of safety and learning health system:** Addresses whether hospitals integrate evidence-based practices and protocols that are fundamental to cultivating a safety culture and learning system within and across hospitals.

- 4. Accountability and transparency:** Supports accountability for outcomes and transparency around safety events and performance—cornerstones for ensuring safety.
- 5. Patient and family engagement:** Supports the effective and equitable engagement of patients, families and caregivers in their own care and in the co-design of safe systems.

Hospitals must assess and affirmatively attest to their performance across five activities within each of the domains. The initial reporting period for the Patient Safety Structural Measure runs through December 2025, with hospitals submitting their scores from April 1 through May 15, 2026. Scores will be publicly reported on the CMS Care Compare website in the fall of 2026, and hospitals that fail to submit data will be subject to payment penalties in fiscal year 2027 (October 2026 through September 2027).

Alignment With Existing Safety Strategies

Historical approaches to safety have frequently placed a disproportionate emphasis on reacting to harm in attempts to improve human performance at the point of care, often through remedial education and reinforcement of policies. The Patient Safety Structural Measure incentivizes leaders to move beyond understanding safety as merely a set of projects focused on improving human performance, and instead use safety science principles to engineer better systems and foster safe cultures. This mindset shift will both optimize human performance and

move emphasis upstream to identify and mitigate safety risks that could result in harm.

While hospitals are not penalized for low Patient Safety Structural Measure scores, public reporting on CMS Care Compare offers consumers a look into whether hospitals have structures and processes in place that are necessary for safety. In subsequent years, this will provide insights on whether and how hospitals are improving their scores. The publicly available scores may guide and influence consumer decisions and selection about where to receive care. Members of the healthcare workforce are likely to consider scores in their selection of future employers, given the desire to work in organizations that have a demonstrable and sustainable commitment to patient safety, and especially because of the inextricable links between patient safety and workforce safety and well-being.

Hospital leaders who embrace and operationalize high-reliability principles (a preoccupation with failure to anticipate and mitigate risk before harm occurs; co-creation and reinforcement of safety systems and practices with the expertise and engagement of patients, families, and the workforce; fostering safety cultures to ensure psychological safety, reporting, transparency, and continuous learning and improvement) in their daily work will find alignment with the intent and focus of the Patient Safety Structural Measure. Its domains and related activities mirror these principles and recognize safety as a real-time, emergent property of a complex healthcare system.

How Hospital Leaders Can Prepare

During the inaugural reporting period, healthcare leaders have a time-sensitive opportunity to establish and refine practices to enable them to achieve higher attestation scores. The Patient Safety Structural Measure is highly aligned with the Safer Together National Action Plan, which addresses the foundational areas of culture, leadership and governance, patient and family engagement, workforce safety and well-being, and the learning system. The companion organizational self-assessment tool provides a freely available platform to conduct a systemwide assessment of a hospital's readiness for the new measures. Recommendations include the following:

- Review, communicate and socialize the intent, domains and attestation requirements of the measure with leadership colleagues, board members, safety and quality staff, and across the organization.
- Convene an interdisciplinary team led by an executive sponsor to assess your hospital's current state of activities compared to the Patient Safety Structural Measure.
- Conduct a systemwide assessment of safety using the Safer Together National Action Plan online Assessment Tool and User Guide, and the Patient Safety Structural Measure Attestation Guide.
- Identify and prioritize Patient Safety Structural Measure gaps and opportunities and senior sponsors for each area of focus.
- Establish action plans and resourcing to advance and sustain improvement, and measure and

monitor progress and opportunities for continuous improvement.

- Participate in learning networks, conferences and educational offerings to build capability and find resources to meet Patient Safety Structural Measure activities.
- Ensure regular, transparent communications with the board and across the organization to foster meaningful engagement of patients, families and the workforce.

The new CMS Patient Safety Structural Measure marks a pivotal shift toward reporting incentives associated with best-known practices for leadership, governance, culture, engagement, and infrastructure to achieve transformational and sustainable improvement in safety. The measure reinforces the critical role of healthcare leaders in fostering systems, cultures and attention to the habitual excellence that is necessary for eliminating harm to patients, families and those who care for them. ▲

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Editor's note: Additional information on the Patient Safety Structural Measure and the attestation guide are available at qualitynet.cms.gov/pch/measures/safety. For more information on the Safer Together National Action Plan, visit ihi.org/safetyactionplan or ache.org/SaferTogether.