



# Educational Brief

## Recommended Practices for PSOs Assigning Pseudo Provider IDs for Data Submission to the PSOPPC

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The Patient Safety and Quality Improvement Act of 2005 "...established the standard by which Patient Safety Work Product (PSWP) would be rendered nonidentifiable ..."1 when submitted by Patient Safety Organizations (PSOs) to the Patient Safety Organization Privacy Protection Center (PSOPPC). This PSOPPC Educational Brief provides guidance to PSOs on the assignment of consistent and uniform pseudo Provider IDs that preserve nonidentifiability of PSWP. Provider IDs are an important data element that enhances the value of the data so that trends and patterns of health care errors can include context such as settings of care and regional statistics. Pseudo IDs also allow for more meaningful aggregation and comparison to improve patient safety, health outcomes, and health care quality.

### Recommended Practices for PSOs assigning Provider IDs for data submission to the PSOPPC:

1. All submitted PSWP must be assigned a **Pseudo ID** in the Provider ID data element. A Pseudo ID is one which is fictitious and does not in any way resemble a direct provider identifier such as names; postal address information, other than town or city; state and zip code; telephone numbers; fax numbers; electronic mail addresses; social security numbers or taxpayer identification numbers; provider or practitioner credentialing or Drug Enforcement Administration (DEA) numbers; national provider identification number; certificate/license numbers; web Universal Resource Locators (URLs); Internet Protocol (IP) address<sup>2</sup>; or any secondary identifier that when combined with direct identifiers could disclose the true identity of the provider.
2. All data submissions to the PSOPPC for any given provider should use the **same** Pseudo ID as submitted previously for that provider.
  - a. All PSWP for a given provider should contain the same Pseudo ID.
  - b. The Provider ID on the PSWP should match the Provider ID submitted for the provider on the PSO Profile Provider Profile submission
3. The PSOPPC recommends PSOs assign the Provider IDs at the **Facility** (entity) level (such as hospital, nursing facility, rehabilitation facility, renal dialysis facility, pharmacy, outpatient rehabilitation facility, Ambulatory Surgical Center (ASC), doctor's office, or urgent care clinic rather than entire health care system, pharmacy chain, hospital ward, individual doctor/physician or pharmacist/pharmacy technician) for the purposes of maintaining consistency, comparability, and practicality for data use and analysis.

### Technical Assistance

Contact the PSOPPC Help Desk for additional technical assistance via email at [support@psoppc.org](mailto:support@psoppc.org), or via phone at (866) 571-7712, Mon-Fri, 9am – 5:30pm, ET. You can also submit an inquiry via our [Contact Us](#) page on the [PSOPPC website](#).

<sup>1</sup> Patient Safety and Quality Improvement Final Rule, section 3.212, pages 70787-70788.

<sup>2</sup> Ibid, section 3.206, pages 70805-70806.

