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June 10, 2009

The Honorable Governor Rick Perry  
Office of the Governor  
State Insurance Building  
1100 San Jacinto  
Austin, TX 78701

Dear Governor Perry:

The American Society of Health-System Pharmacists (ASHP) has followed closely the progress of HB 1924, and has serious concerns about the patient safety implications for the citizens of Texas if this bill becomes law. While the enrolled version of the bill is a compromise that focuses on improving patient care in small and rural hospitals, it is not an ideal solution and we strongly urge you to continue to push for an equal standard of care for all Texas hospitals, rural and urban alike.

ASHP, along with our affiliate, the Texas Society of Health-System Pharmacists (TSHP), recognize the difficulties that rural hospitals face with regards pharmacist staffing. However, a strong emphasis on patient safety must be maintained. As the national professional association representing over 35,000 members who practice in hospitals and health systems, ASHP has unique expertise to share on these important patient safety and quality of care issues. Pharmacists in hospitals and health systems are experts in medication use who work with physicians, nurses, and other health-care professionals to ensure that medicines are used safely, effectively, and in a cost-conscious manner. ASHP members practice in both large, academic settings as well as in small, rural hospitals.

ASHP and TSHP believe that it is in the best interest of public health and patient safety for pharmacists, as *the* medication-use experts, to retain their professional and statutory role in the medication-use process, which is to protect patients from harm and ensure optimal medication therapy outcomes. We also believe that it is critical to avoid the establishment of a lower standard of care for small and rural hospitals within the state. The citizens of rural Texas deserve the same quality of care that their urban counterparts enjoy. Compromising the quality of care and patient safety should not be the answer to the question of how to address a population with increasing needs and fewer resources.

HB 1924 also addresses the issue of retrospective review of medication orders. We applaud the continuing efforts of the Texas Board of Pharmacy to create rules and regulations that emphasize the value of both retrospective and prospective medication therapy review. Both are critical processes for preventing medication errors and improving patient care outcomes. However, we are concerned that the current language in HB 1924 does not reflect what we believe is the most appropriate timeframe for the required retrospective review. Retrospective review should be done as soon as possible, in order to provide the optimal opportunity for corrections or changes in medication therapy for the patient.

The citizens of Texas, both rural and urban, deserve to have a consistent patient safety standard for all hospitals. Without the valuable skills and knowledge of Texas hospital pharmacists, patient safety will be compromised. Therefore, ASHP urges you to keep the issue of a safe medication use system in small and rural hospitals as a key priority in next year's legislative session. In the interim, we suggest that you consider establishing a commission (or similar study group), that would work with the Texas Board of Pharmacy, TSHP, and other key stakeholders to ensure that the necessary protections and protocols are in place for the safe and effective use of medications throughout the state. The commission should consider how health information technology can be used to provide pharmacist services to small and rural hospitals. Telehealth, telepharmacy, and the use of an electronic health record can be part of an effective solution for rural hospitals.

While TSHP continues to work with the Texas Board of Pharmacy and other stakeholders to modernize pharmacy practice and advance patient safety in the State of Texas we encourage you to carefully consider HB 1924 and its implications. If you have any questions regarding these comments or if I can provide you with additional information, I invite you to contact me or GERALYN M. TRUJILLO, ASHP's Director of State Government Affairs (301-664-8687, [gtrujillo@ashp.org](mailto:gtrujillo@ashp.org)). We appreciate this opportunity to voice our concerns.

Sincerely,



Henri R. Manasse, Jr., Ph.D., Sc.D.  
Executive Vice President and Chief Executive Officer

cc: Paul F. Davis, Executive Director, Texas Society of Health-System Pharmacists  
Todd Canada, President, Texas Society of Health-System Pharmacists