



American Society of
Health-System Pharmacists
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April 21, 2009

The National Quality Forum
601 Thirteenth Street, NW
Suite 500 North
Washington, DC 20005

RE: Pre-voting review for *National Voluntary Consensus Standards for Home Health Care: Additional Performance Measures, 2008- ADDENDUM*

The American Society of Health-System Pharmacists (ASHP) is pleased to have the opportunity to comment on the proposed addendum to the National Voluntary Consensus Standards for Home Health Care. ASHP represents pharmacists who practice in hospitals and health systems. The Society's more than 35,000 members include pharmacists and pharmacy technicians who practice in a variety of health-system settings, including inpatient, outpatient, home care, and long-term-care settings.

Measure # AHH-028-08. Multifactor Fall Risk Assessment Conducted

ASHP commends the NQF on recognizing the importance of a multifactorial fall risk assessment including an assessment of multiple medication use. The Society supports the use of tools to assess an individual's fall risk. As currently written, Appendix E lists five such tools. However, it is important to note that the Morse assessment does not consider medications that might increase the patient's risk for falls. Due to the significant association between medication use and falls¹, the assessment of medications in fall risk evaluation is critical (see data at http://www.psa.state.pa.us/psa/lib/psa/advisories/v5n1march_2008/mar_2008_v5_n1_article_medication_assessment_falls.pdf). In one study², the review of medications decreased falls by 47% and decreased the use of cardiovascular drugs, analgesics, psychoactive medications, and sedatives and hypnotics. The Society suggests that the tools currently listed be re-evaluated and only those that include an assessment of the use of medications that may increase fall risk (e.g. diuretics, opioids, benzodiazepines) be recommended for use.

Thank you for the opportunity to provide feedback on the proposed addendum to the *National Voluntary Consensus Standards for Home Health Care*. If you have any questions concerning

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the Society's comments, please contact me by phone at (301) 664-8815 or via e-mail at mandrawis@ashp.org.

Regards,

A handwritten signature in black ink, appearing to read 'Mary Andrawis', with a long horizontal flourish extending to the right.

Mary Andrawis, Pharm.D., M.P.H.
Medication-Use Quality Improvement Associate
American Society of Health-System Pharmacists

References

1. Walker PC, Alrawi A, Mitchell JF, Regal RE, and Khanderia U. Medication use as a risk factor for falls among hospitalized elderly patients. *Am J Health-Syst Pharm.*, Dec 2005; 62: 2495 - 2499.
2. Haumschild MJ, Karfonta TL, Haumschild MS, and Phillips SE. Clinical and economic outcomes of a fall-focused pharmaceutical intervention program. *Am. J. Health Syst. Pharm.*, May 2003; 60: 1029 - 1032.