



American Society of  
Health-System Pharmacists  
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July 10, 2009

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

Re: NQF Member Vote on *National Voluntary Consensus Standards for Medication Management*

On behalf of the American Society of Health-System Pharmacists (ASHP), thank you for the opportunity to vote on the proposed “*National Voluntary Consensus Standards for Medication Management*.” As the national professional association representing over 35,000 pharmacists who practice in hospitals and health systems, ASHP can offer unique and vital feedback on this important health care issue. Pharmacists in hospitals and health systems are experts in medication use who serve on interdisciplinary patient-care teams to ensure that medicines are used safely, effectively, and in a cost-conscious manner. Our membership ID is 0800ASHSP and our vote has been submitted online via the NQF Member Portal.

The Society would like to gratefully thank NQF for considering and addressing all of [ASHP's comments](#) submitted on May 11, 2009. ASHP is pleased that NQF incorporated many of the Society's suggestions in the voting draft of the *National Voluntary Consensus Standards for Medication Management*. These comments related to acknowledgement of the limitations of the proposed medication management measures in assessing quality of care, expansion of research recommendations to include development of measures that assess the use of technology and that capture the value of pharmacist-provided services that occur during the order review process, expansion of measures beyond Part D beneficiaries to the general population (MM-003, MM-004, MM-006, MM-010, MM-014, MM-030, and MM-031), clarification of the intended level of measurement (MM-034 and MM-035), and inclusion of a definition of ‘inappropriate medications.’

ASHP applauds NQF's acknowledgement of the limitations of the proposed medication management measures given the databases available as well as the limited extent and type of candidate measures currently available. While the Society supports the proposed measures, it recommends that these serve as the foundation for ongoing efforts to develop additional and more robust medication management measures. ASHP votes to approve all 19 measures proposed for endorsement however, the Society urges NQF to consider the following comments.

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The Society encourages NQF to create a process to pursue an ongoing and broader request of candidate measures for medication management and readdress this area in the near future (it may be useful to establish and release a timeline when issuing these measures). The steering committee and NQF should strive to develop more robust and inclusive measures, especially those that measure outcomes. As more robust individual measures are developed, composite measures that are easier to understand should be developed and assessed.

Thank you for the opportunity to provide feedback on the proposed *National Voluntary Consensus Standards for Medication Management*. If you have any questions concerning the Society's vote or comments, please contact me by phone at (301) 664-8815 or via e-mail at [mandrawis@ashp.org](mailto:mandrawis@ashp.org).

Regards,

A handwritten signature in black ink, appearing to read "Mary Andrawis". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mary Andrawis, Pharm.D., M.P.H.  
Director, Clinical Guidelines and Quality Improvement  
American Society of Health-System Pharmacists