



American Society of  
Health-System Pharmacists®  
7272 Wisconsin Avenue  
Bethesda, Maryland 20814  
301-657-3000  
Fax: 301-664-8892  
[www.ashp.org](http://www.ashp.org)

July 3, 2008

Representative Susan Westrom, Kentucky  
Chairwoman, Health, Long-Term Care, and Health Retirement Issues Committee  
National Conference of Insurance Legislators  
385 Jordan Road  
Troy, NY 12180

Representative Carl Epps, Georgia  
Vice-Chairman, Health, Long-Term Care, and Health Retirement Issues Committee  
National Conference of Insurance Legislators  
385 Jordan Road  
Troy, NY 12180

RE: Proposed Resolution Regarding Transparency for Patients in Prescription Drug Care

Dear Representative Westrom and Representative Epps:

On behalf of the American Society of Health-System Pharmacists (ASHP), I appreciate the opportunity to seek clarification and provide some thoughts on your proposed resolution regarding transparency for patients in prescription drug care. ASHP commends the National Conference of Insurance Legislators (NCOIL) for taking steps to encourage the appropriate use of pharmaceuticals, an issue that affects us all.

For more than 60 years, ASHP has helped pharmacists who practice in hospitals and health systems improve medication use and enhance patient safety. The Society's 35,000 members include pharmacists and pharmacy technicians who practice in inpatient, outpatient, home-care, and long-term-care settings, as well as pharmacy students. As health care providers, we take patient safety and prescription efficacy very seriously.

ASHP strongly believes that pharmacists should be guided only by the consideration of patient care. Having reviewed your proposed resolution, we would request clarification that it is not intended to apply to hospital and health-system settings.

As you may know, hospitals and health-system pharmacy and therapeutic (P&T) committees utilize ASHP best practices in allowing generic substitution and therapeutic interchange.

Comment Letter to NCOIL  
Proposed Resolution on Transparency in Prescription Drug Care  
July 3, 2008  
Page 2

ASHP's professional policies contain varying levels of detail, ranging from policy positions (short pronouncements on one aspect of practice) to therapeutic position statements (concise responses to specific therapeutic issues) to therapeutic guidelines (thorough, evidence-based recommendations on drug use). These professional best practices represent a consensus of professional judgment, expert opinion, and documented evidence.

We support practices that emphasize the patient and the appropriate treatment of each patient as a paramount treatment goal. As current ASHP policy states, 'consideration of patient care and unbiased reviews of the biomedical literature are the cornerstone principles of formulary decision-making... even the appearance of a potential [conflict of interest] can undermine a formulary decision.'<sup>1</sup> Our policies are intended to recognize the need to balance a productive collaborative environment while preventing inappropriate behaviors that could negatively impact public health and overall patient care.

Through the efforts of P&T committees and our membership, ASHP is confident that the issue of transparency regarding generic substitution and therapeutic interchanges within hospital and health-system settings is one that has been addressed appropriately. Any modification that would clarify that the resolution is not intended to apply to hospitals and health-system pharmacists would be most useful.

We look forward to working with you and becoming an active participant in your discussions as we work towards ensuring the safety and efficacy of prescription drugs. For more information on the many ways in which pharmacists help people make the best use of medicines, I invite you to visit ASHP's Web site, [www.ashp.org](http://www.ashp.org), or our consumer Web site, [www.SafeMedication.com](http://www.SafeMedication.com). I also invite you to contact me directly, should you have any questions or need additional information (301-664-8687, [gtrujillo@ashp.org](mailto:gtrujillo@ashp.org)).

Sincerely,



Geralyn Trujillo, MPP  
Director, State Government Affairs

cc: Jordan Estey, Director of Legislative Affairs and Education, NCOIL

---

<sup>1</sup> [http://www.ashp.org/s\\_ashp/docs/files/BP07/New\\_Gdl\\_Formulary.pdf](http://www.ashp.org/s_ashp/docs/files/BP07/New_Gdl_Formulary.pdf). page 4.