Introduction

*ASHP Policy Positions 1982–2020* is a catalog of professional policy positions adopted by the ASHP House of Delegates, organized from the most current year, 2020, back to those adopted in 1982. The foundations for ASHP’s policy positions are its Mission Statement and its purposes as stated in the ASHP Charter. ASHP is the national professional organization whose over 50,000 members include pharmacists, pharmacy technicians, and pharmacy students who provide patient care services in hospitals, health systems, and ambulatory clinics. For more than 75 years, the Society has been on the forefront of efforts to improve medication use and enhance patient safety. For more information about the wide array of ASHP activities and the many ways in which pharmacists help people make the best use of medicines, visit ASHP's website, [www.ashp.org](http://www.ashp.org), or its consumer website, [www.safemedication.com](http://www.safemedication.com). ASHP is the only national organization of hospital and health-system pharmacists and has a long history of improving medication use and enhancing patient safety. The Society has extensive publishing and educational programs designed to help members improve their delivery of pharmaceutical care, and it is the national accrediting organization for pharmacy residency and pharmacy technician training programs.

ASHP believes that the mission of pharmacists is to help people achieve optimal health outcomes. ASHP helps its members achieve this mission by advocating and supporting the professional practice of pharmacists in hospitals, health systems, ambulatory clinics, and other settings spanning the full spectrum of medication use. ASHP serves its members as their collective voice on issues related to medication use and public health. The purposes of ASHP, as stated in the ASHP Charter, are as follows:

1. To advance public health by promoting the professional interests of pharmacists practicing in hospitals and other organized health-care settings through:
   a. Fostering pharmaceutical services aimed at drug-use control and rational drug therapy.
   b. Developing professional standards for pharmaceutical services.
   c. Fostering an adequate supply of well-trained, competent pharmacists and associated personnel.
   d. Developing and conducting programs for maintaining and improving the competence of pharmacists and associated personnel.
   e. Disseminating information about pharmaceutical services and rational drug use.
   f. Improving communication among pharmacists, other members of the health-care industry, and the public.
   g. Promoting research in the health and pharmaceutical sciences and in pharmaceutical services.
   h. Promoting the economic welfare of pharmacists and associated personnel.
2. To foster rational drug use in society such as through advocating appropriate public policies toward that end.

3. To pursue any other lawful activity that may be authorized by ASHP’s Board of Directors.

Each policy position in this catalog is identified by a four-digit number: the first two digits show the year that the policy was approved by the House of Delegates, and the third and fourth digits are sequencing numbers. The source for each policy position indicates how the policy position was introduced to the House of Delegates, e.g., in a report of a council, through the Chair of the Board, or as a resolution. The rationale for policy positions approved since 2009 are provided following the text of the policy. This information is intended to support the ASHP policies approved by ASHP’s councils, Board, and House of Delegates, but it is not ASHP policy and should not be interpreted or construed as such.

All ASHP policy positions are published annually in this document, and practice-related policy positions are compiled in *Best Practices: Positions and Guidance Documents of ASHP*. 
Practice-Related Positions Listed by Topic

Automation and Information Technology
2015 - Network Connectivity and Interoperability for Continuity of Care*
1701 - Ensuring Patient Safety and Data Integrity During Cyber-attacks*
1708 - Mobile Health Tools, Clinical Apps, and Associated Devices*
1608 - Therapeutic Indication in Clinical Decision Support Systems*
1529 - Online Pharmacy and Internet Prescribing*
1418 - Risk Assessment of Health Information Technology*
1302 - Interoperability of Patient-Care Technologies*
1211 - Pharmacist’s Role in Health Care Information Systems*
1212 - Clinical Decision Support Systems*
1020 - Role of Pharmacists in Safe Technology Implementation*
0712 - Electronic Health and Business Technology and Services
0105 - Computerized Prescriber Order Entry
9813 - Regulation of Automated Drug Distribution Systems

Drug Distribution and Control
1702 - Reduction of Unused Prescription Drug Products*
1709 - Controlled Substance Diversion Prevention*
0611 - Redistribution of Unused Medications
0303 - Pharmacy Drug Theft
0232 - Pharmacist’s Role in Drug Procurement, Distribution, Surveillance, and Control
9903 - Optimizing the Medication-Use Process

Preparation and Handling
2024 - Safety and Efficacy of Compounded Topical Formulations*
1903 - Compounded Sterile Preparation Verification*
1813 - Use of Closed-System Transfer Devices to Reduce Drug Waste*
0903 - Pharmaceutical Waste*
0614 - Safe Disposal of Patients’ Home Medications
0616 - Safe and Effective Extemporaneous Compounding

Distribution
2022 - Dispensing by Nonpharmacists and Nonprescribers*
1913 - Pharmaceutical Distribution Systems*
0310 - Technician-Checking-Technician Programs

Education and Training
2027 - Residency Training for Pharmacists Who Provide Direct Patient Care*
1911 - Pharmacy Expertise in Sterile Compounding*
1912 - Pharmacy Technician Training and Certification*
1917 - Pharmacy Technician Student Drug Testing*
1918 - Minimum Educational Qualification Standards for Pharmacists*
1825 - Clinician Well-being and Resilience*
1826 - Student Pharmacist Drug Testing*
1827 - Collaboration on Experiential Education*
1829 - Pharmacy Training Models*
1706 - ASHP Guidelines, Statements, and Professional Policies as an Integral Part of the Educational Process*
1611 - Developing Leadership Competencies*
1612 - Interprofessional Education and Training*
1613 - Cultural Competency*
1317 - Education and Training in Health Care Informatics*
1201 - Preceptor Skills and Abilities*
1203 - Qualifications of Pharmacy Technicians in Advanced Roles*
1108 - Quality of Pharmacy Education and Expansion of Colleges of Pharmacy*
1109 - Residency Equivalency*
1110 - Pharmacy Internships*
1111 - State-Specific Requirements for Pharmacist Continuing Education*
1112 - Innovative Residency Models*
1008 - Employment Classification and Duty Hours of Pharmacy Residents*
0913 - Pharmacy Student Experiences in Medically Underserved Areas*
0916 - Continuing Professional Development*
0917 - Pharmacy Residency Training*
0704 - Residency Programs
0510 - Communication Among Health-System Pharmacy Practitioners, Patients, and Other Health Care Providers
0323 - Licensure for Pharmacy Graduates of Foreign Schools
0325 - Public Funding for Pharmacy Residency Training
8507 - Career Counseling

Ethics
2036 - Racial and Discriminatory Inequities*
1704 - Medical Aid In Dying*
1531 - Pharmacist Role in Capital Punishment*
1403 - Pharmacist’s Role on Ethics Committees*
1116 - Ethical Use of Placebos in Clinical Practice*
0610 - Pharmacist’s Right of Conscience and Patient’s Right of Access to Therapy*
0013 - Patient’s Right to Choose

Formulary Management (Medication-Use Policy Development)
2016 - Medication Formulary System Management*
1802 - Gene Therapy*
1820 - Medical Devices*
1104 - Pharmacogenomics*
0817 - Generic Substitution of Narrow Therapeutic Index Drugs
0305 - Expression of Therapeutic Purpose of Prescribing

*Rationale follows policy language.
8708 - Therapeutic Interchange

Government, Law, and Regulation
2004 - Evaluation of Abuse-Deterrent Drug Mechanisms*
2005 - Quality Consumer Medication Information*
2007 - Use of Surrogate Endpoints for FDA Approval of Drug Uses*
2012 - Importation of Drug Products*
2013 - Public Quality Standards for Biologic Products*
2019 - Access to Affordable Healthcare*
2021 - Funding, Expertise, and Oversight of State Boards of Pharmacy*
2023 - New Categories of Licensed Pharmacy Personnel*
2025 - Postmarketing Studies*
2026 - Gabapentin as a Controlled Substance* 36
2030 - Interstate Pharmacist Licensure*
2037 - Support of the World Health Organization*
1904 - Notification of Drug Product Price Increases*
1905 - Mitigating Drug Product Shortages*
1906 - Emergency Supplies of Drug Products*
1908 - 340B Drug Pricing Program Sustainability*
1909 - Pharmacist Authority to Provide Medication-Assisted Treatment*
1922 - Antimicrobial Use in Agriculture*
1803 - Confidence in the U.S. Drug Approval and Regulatory Process*
1815 - Impact of Drug Litigation Ads on Patient Care*
1816 - Biosimilar Medications*
1818 - Federal Quality Rating Program for Pharmaceutical Manufacturers*
1819 - Intravenous Fluid Manufacturing Facilities as Critical Public Health Infrastructure*
1713 - Partial Filling of Schedule II Prescriptions*
1715 - Collaborative Practice*
1716 - Greater Competition Among Generic and Biosimilar Manufacturers*
1602 - Drug Product Supply Chain Integrity*
1621 - Timely Board of Pharmacy Licensing*
1622 - Inclusion of Drug Product Shortages in State Price-gouging Laws*
1501 - Pharmacist Participation in Health Policy Development*
1502 - Pharmacist Recognition as a Healthcare Provider*
1506 - Premarketing Comparative Clinical Studies*
1507 - Funding, Expertise, and Oversight of State Boards of Pharmacy*
1508 - Support for FDA Expanded Access (Compassionate Use) Program*
1512 - Development of Abuse-Resistant Narcotics*
1405 - Automatic Stop Orders*
1406 - Federal and State Regulation of Compounding*
1408 - State Prescription Drug Monitoring Programs*
1410 - Access to Oral Contraceptives Through an Intermediate Category of Drug Products*
1411 - Expedited Pathways for FDA Drug Approval*
1412 - FDA Oversight of Laboratory-Developed Tests*

Click policy number or title to view policy.
*Rationale follows policy language.
1310 - Regulation of Telepharmacy Services*
1311 - Regulation of Centralized Order Fulfillment*
1315 - DEA Scheduling of Controlled Substances*
1216 - Pharmacy Technicians*
1219 - Stable Funding for HRSA Office of Pharmacy Affairs*
1223 - Globalization of Clinical Trials*
1101 - Medical Marijuana*
1102 - Agricultural Use of Hormone and Prohormone Therapies*
1103 - Direct-to-Consumer Clinical Genetic Tests*
1121 - Poison Control Center Funding*
1002 - Risk Evaluation and Mitigation Strategies*
1003 - FDA Authority on Recalls*
1007 - Regulation of Home Medical Equipment Medication Products and Devices*
0909 - Regulation of Interstate Pharmacy Practice*
0811 - Regulation of Dietary Supplements
0813 - Medicare Prescription Drug Benefit
0719 - FDA Authority to Prohibit Reuse of Brand Names
0602 - Minimum Effective Doses
0516 - Mandatory Registry of Clinical Trials
0012 - FDA's Public Health Mission

**Medication Safety**
1505 - Statutory Protection for Medication-Error Reporting*
1524 - Support for Second Victims*
1530 - Standardization of Small-Bore Connectors to Avoid Wrong-Route Errors*
1115 - Just Culture*
1021 - Just Culture and Reporting Medication Errors*
0604 - Minimizing the Use of Abbreviations
0020 - Drug Names, Labeling, and Packaging Associated With Medication Errors
9609 - Human Factors Concepts

**Medication Therapy and Patient Care**

**Organization and Delivery of Services**
2008 - Health-System Facility Design*
2031 - Continuity of Care in Insurance Payer Networks*
2032 - Health-System Use of Medications Supplied to Hospitals by Patients, Caregivers, or Specialty Pharmacies*
2033 - Health-System Use of Administration Devices Supplied Directly to Patients*
1902 - Safe Administration of Hazardous Drugs*
1808 - Patient Access to Pharmacist Care Within Provider Networks*
1809 - Health Insurance Policy Design*
1811 - Use of International System of Units for Patient- and Medication-related Measurements*

*Click policy number or title to view policy.
*Rationale follows policy language.*
1822 - Rational Use of Medications*
1823 - Responsible Medication-related Clinical Testing and Monitoring*
1824 - Use of Biomarkers in Clinical Practice*
1703 - Pharmacist’s Leadership Role in Anticoagulation Therapy Management*
1721 - Clinical Significance of Accurate And Timely Height And Weight Measurements*
1616 - Patient Experience*
1618 - Integrated Approach for the Pharmacy Enterprise*
1619 - Preventing Exposure to Allergens*
1504 - Patient Adherence Programs as Part of Health Insurance Coverage*
1511 - Complementary and Alternative Medicine in Patient Care*
1523 - Pharmacist’s Role in Population Health Management*
1525 - Standardization of Doses*
1401 - Standardization of Oral Liquid Medication Concentrations*
1419 - Documentation of Patient-Care Services in the Permanent Health Record*
1306 - Standardization of Intravenous Drug Concentrations*
1313 - Drug-Containing Devices*
1202 - Qualifications and Competencies Required To Prescribe Medications*
1208 - Transitions of Care*
1213 - Pharmacist Prescribing in Interprofessional Patient Care*
1215 - Pharmacist’s Role in Team-Based Care*
1222 - Medication Adherence*
1107 - Patient-Reported Outcomes Tools*
1114 - Pharmacist Accountability for Patient Outcomes*
1117 - Pharmacists’ Role in Medication Reconciliation*
1005 - Medication Therapy Management*
1022 - Patient Access to Pharmacy Services in Small and Rural Hospitals*
1023 - Scope and Hours of Pharmacy Services*
0707 - Standard Drug Administration Schedules
0601 - Universal Influenza Vaccination
0502 - Health Care Quality Standards and Pharmacy Services
0525 - Mandatory Tablet Splitting for Cost Containment
0202 - Performance Improvement
0101 - Pharmacy Benefits for the Uninsured
9820 - Medication Administration by Pharmacists

Specific Practice Areas
2001 - Safety and Effectiveness of Ethanol for Prevention or Treatment of Alcohol Withdrawal Syndrome*
2003 - Anticancer Treatment Parity*
2009 - Role of the Pharmacy Workforce in Identifying and Caring for Victims of Human Trafficking*
2014 - Naloxone Availability*
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Click policy number or title to view policy.
*Rationale follows policy language.
2018 - Safe Use of Transdermal System Patches*
2029 - Preserving Patient Access to Pharmacy Services by Medically Underserved Populations*
2035 - Role of the Pharmacy Workforce in Violence Prevention*
1901 - Suicide Awareness and Prevention*
1910 - Therapeutic Use of Cannabidiol*
1921 - Testing and Documentation of Penicillin Allergy as a Component of Antimicrobial Stewardship*
1831 - Safe and Effective Use of IV Promethazine*
1718 - Therapeutic And Psychosocial Considerations of Transgender Patients*
1719 - Pharmacist’s Leadership Role in Glycemic Control*
1722 - Pain Management*
1724 - Safe and Effective Therapeutic Use of Invertebrates*
1725 - Drug Dosing in Extracorporeal Therapies*
1601 - Safety of Intranasal Route as an Alternative Route of Administration*
1603 - Stewardship of Drugs with Potential for Abuse*
1604 - Appropriate Use of Antipsychotic Drug Therapies*
1605 - Safety of Epidural Steroid Injections*
1607 - Use of Methadone to Treat Pain*
1614 - Controlled Substance Diversion and Patient Access*
1625 - Tobacco, Tobacco Products, and Electronic Nicotine Delivery Systems*
1527 - Pharmacist’s Role in Urgent and Emergency Situations*
1402 - Pharmacist’s Role in Providing Care for an Aging Population*
0920 - Pharmacist Support for Dying Patients
9711 - Interventions to Reduce High-Risk Behaviors in Intravenous Drug Users

Pharmaceutical Industry

Drug Products, Labeling, and Packaging
2002 - Excipients in Drug Products*
1801 - Unit Dose Packaging Availability*
1812 - Availability and Use of Appropriate Vial Sizes*
1821 - Ensuring Effectiveness, Safety, and Access to Orphan Drug Products*
1711 - Ready-to-Administer Packaging for Hazardous Drug Products Intended for Home Use*
1712 - Expiration Dating of Pharmaceutical Products*
1615 - Protecting Workers from Exposure to Hazardous Drugs*
1535 - Nonproprietary Naming of Biological Products*
0920 - Standardized Clinical Drug Nomenclature*

Click policy number or title to view policy.
*Rationale follows policy language.
0720 - Standardizing Prefixes and Suffixes in Drug Product Names
0501 - Mandatory Labeling of the Presence of Latex
0402 - Ready-To-Use Packaging for All Settings
0002 - Drug Shortages
9707 - Pediatric Dosage Forms
9608 - Use of Color to Identify Drug Products
9211 - Tamper-Evident Packaging on Topical Products
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8613 - Elimination of Apothecary System

Marketing
1806 - Manufacturer-sponsored Patient Assistance Programs*
1714 - Restricted Drug Distribution*
1620 - Promotion of Off-Label Uses*
1624 - Ban on Direct-to-Consumer Advertising for Prescription Drugs and Medication-Containing Devices*
1521 - Identification of Prescription Drug Coverage and Eligibility for Patient Assistance Programs*
9702 - Drug Samples

Pharmacy Management
2028 - Pharmacist’s Role in Health Insurance Benefit Design*
1914 - Safe Medication Preparation, Compounding, and Administration in All Sites of Care*
1915 - Pharmacy Department Business Partnerships*
1810 - Pharmacy Accreditations, Certifications, and Licenses*
1522 - Disposition of Illicit Substances*
1417 - Integration of Pharmacy Services in Multifacility Health Systems*
0901 - Workload Monitoring and Reporting*
0918 - Pharmacist Leadership of the Pharmacy Department*
0504 - Pharmacy Staff Fatigue and Medication Errors

Compensation and Reimbursement
2020 - Care-Commensurate Reimbursement*
1814 - Direct and Indirect Remuneration Fees*
1807 - Reimbursement and Pharmacist Compensation for Drug Product Dispensing*
1710 - Revenue Cycle Compliance and Management*
1301 - Payer Processes for Payment Authorization and Coverage Verification*
1209 - Value-Based Purchasing*
0206 - Reimbursement for Unlabeled Uses of FDA-Approved Drug Products

Human Resources
2011 - Credentialing and Privileging by Regulators, Payers, and Providers of Collaborative Practice*
2034 - Staffing for Safe and Effective Patient Care*

Click policy number or title to view policy.
*Rationale follows policy language.
1907 - Credentialing and Privileging by Regulators, Payers, and Providers for Collaborative Practice*
1916 - Intimidating or Disruptive Behavior*
1828 - Promoting the Image of Pharmacists and Pharmacy Technicians*
1705 - Workforce Diversity*
1717 - Drug Testing*
1610 - Career Opportunities for Pharmacy Technicians*
1415 - Credentialing, Privileging, and Competency Assessment*
1207 - Financial Management Skills*
1225 - Board Certification for Pharmacists*
1113 - Professional Socialization*
0810 - Education, Prevention, and Enforcement Concerning Workplace Violence
0812 - Appropriate Staffing Levels
0615 - Influenza Vaccination Requirements to Advance Patient Safety and Public Health
0218 - Pharmacist Recruitment and Retention
0112 - Professional Development as a Retention Tool
9108 - Employee Testing

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2010 - Use of Two Patient Identifiers in the Outpatient Setting*
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**Research**
1920 - Research on Drug Use in Obese Patients*
1804 - Drug Dosing in Conditions that Modify Pharmacokinetics or Pharmacodynamics*
1723 - Clinical Investigations of Drugs Used in Elderly and Pediatric Patients*
0711 - Institutional Review Boards and Investigational Use of Drugs

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**Approval of ASHP Statements**
2038 - ASHP Statement on the Use of Artificial Intelligence in Pharmacy
1919 - ASHP Statement on the Role of the Medication Safety Leader
1830 - ASHP Statement on Advocacy as a Professional Obligation
1626 - Telepharmacy
1532 - Roles and Responsibilities of the Pharmacy Executive
1533 - Pharmacist’s Role in Substance Abuse Prevention, Education, and Assistance
1534 - Pharmacist’s Role in Clinical Informatics
1537 - Roles of Pharmacy Technicians
1421 - Pharmacist’s Role in Clinical Pharmacogenomics
1319 - Pharmacy Technician’s Role in Pharmacy Informatics
1226 - Role of the Medication Safety Leader
1227 - Pharmacist’s Role in Medication Reconciliation
1228 - Use of Social Media by Pharmacy Professionals

*Click policy number or title to view policy.
*Rationale follows policy language.
1123 - Leadership as a Professional Obligation
1025 - Bar-Code Verification During Inventory, Preparation, and Dispensing of Medications
0922 - Pharmacist’s Role in Antimicrobial Stewardship and Infection Prevention and Control
0923 - Health-System Pharmacist’s Role in National Health Care Quality Initiatives
0818 - Bar-Code-Enabled Medication Administration
0820 - Standards-Based Pharmacy Practice in Hospitals and Health Systems
0821 - Pharmacy Services to the Emergency Department
0822 - Pharmacy and Therapeutics Committee and the Formulary System
0823 - Confidentiality of Patient Health Care Information
0824 - Criteria for an Intermediate Category of Drug Products
0724 - Role of Health-System Pharmacists in Public Health
0725 - Professionalism
0726 - Racial and Ethnic Disparities in Health Care
0526 - Over-the-Counter Availability of Statins
0415 - Use of Dietary Supplements
0326 - Role of Health-System Pharmacists in Emergency Preparedness
0234 - Pharmacist’s Role in Hospice and Palliative Care
0235 - Role of Health-System Pharmacists in Emergency Preparedness
0023 - Reporting Medical Errors
9916 - Pharmacist Decision-Making on Assisted Suicide
9922 - Pharmacist's Role in Primary Care
9821 - Pharmacist’s Role in Clinical Pharmacokinetic Monitoring
9504 - Pharmacist's Responsibility for Distribution and Control of Drug Products
9505 - Role of the Pharmacist in Patient-Focused Care
9304 - Pharmaceutical Care
9306 - Pharmacist’s Role with Respect to Drug Delivery Systems and Administration Devices
9208 - Use of Medications for Unlabeled Uses
9111 - Pharmaceutical Research in Organized Health-Care Settings
8907 - Unit Dose Drug Distribution
8504 - Third-Party Compensation for Clinical Services by Pharmacists

**ASHP Endorsements**
9607 - Code of Ethics

**ASHP Governance**
0118 - State Affiliate Membership and ASHP Appointments
9506 - Time of the ASHP Midyear Clinical Meeting
9411 - Name Change

*Click policy number or title to view policy.
*Rationale follows policy language.
2020 Policy Positions

2001
SAFETY AND EFFECTIVENESS OF ETHANOL FOR PREVENTION OR TREATMENT OF ALCOHOL WITHDRAWAL SYNDROME

Source: Council on Therapeutics

To oppose the use of oral or intravenous ethanol for the prevention or treatment of alcohol withdrawal syndrome (AWS) because of its poor effectiveness and safety profile; further,

To support hospital and health-system efforts that prohibit the use of oral or intravenous ethanol therapies to prevent or treat AWS; further,

To support the removal of oral or intravenous ethanol from hospital and health systems for the prevention and treatment of AWS; further,

To educate clinicians about evidence-based therapies for AWS.

This policy supersedes ASHP policy 1514.

Rationale

AWS can delay patient recovery and interfere with response to therapy. Based on a review of the available evidence, including treatment guidelines from the American Society of Addiction Medicine (ASAM), ASHP opposes the use of oral or intravenous ethanol to prevent or treat AWS. Limited and conflicting evidence of effectiveness, inability to achieve accurate and consistent dosing and blood levels, and the availability of safer and more effective therapies are among the reasons to oppose use of ethanol to prevent or treat AWS symptoms. Benzodiazepines are the preferred drugs for the treatment of AWS, along with other supportive and adjunctive therapies as clinically appropriate. Guidelines from the American Association of Family Physicians recommend benzodiazepines on a fixed schedule for AWS, outpatient detoxification, and enrollment in an alcohol treatment program. ASHP supports efforts to prohibit use of ethanol for AWS and advocates education to a variety of healthcare practitioner audiences to increase awareness of appropriate evidence-based therapies.

2002
EXCIPIENTS IN DRUG PRODUCTS

Source: Council on Therapeutics

To advocate that manufacturers remove unnecessary, potentially allergenic excipients from all drug products; further,

To encourage manufacturers to publicly disclose all excipients in drug products; further,

To advocate that the Food and Drug Administration require manufacturers to declare the name and derivative source of all excipients in drug products on the official label; further,
To advocate that vendors of medication-related databases incorporate, expand, and maintain interoperable information about excipients; further,

To promote research that evaluates the safety of excipients to guide clinical practice and to support the reporting and dissemination of this information via published literature, registries, and other mechanisms; further,

To foster education on the potential adverse events that may be caused by excipients; further,

To encourage documentation of allergic reactions or intolerances to or restrictions on specific excipients in the health record.

This policy supersedes ASHP policy 1528.

**Rationale**

Excipients are intended to be inactive ingredients that assist in delivering a pharmaceutically elegant medication. Ideally, excipients should have a specific purpose, including serving as a binder, disintegrant, solubilizer, preservative, or for pH adjustment for the proper performance of the dosage form. The properties of the final dosage form (e.g., stability) are, for the most part, highly dependent on the excipients chosen, their concentrations, and interaction with both the active compound and each other. Poor aqueous solubility and rate of dissolution are often the two critical factors that affect the formulation and development process and as a result, some formulations of medications may include high percentages of excipients to ensure the active ingredients are able to be delivered. However, some excipients are added to formulations to enhance color or texture and are not necessary for a stable and soluble product.

In some patients, however, excipients may cause adverse events or aggravate medical conditions. Examples include patients with a red-dye allergy reacting to a suspension containing red dye, fillers that have a high carbohydrate content breaking ketosis in patients who are on a ketogenic diet for seizure management, exacerbation of kidney dysfunction in patients receiving a parenteral solution containing cyclodextrins, or metabolic ketoacidosis requiring dialysis in patients who are receiving high amounts of propylene glycol. Additionally, these adverse effects are not always well known or studied.

Inclusion of excipients in drug product labeling, including their derivative source would allow substitution of a nonallergenic alternative, modification of therapy (such as giving a tablet instead of a dextrose containing suspension), closer monitoring of organ function, or ordering pertinent lab values that may alert practitioners to toxicities associated with excipients as opposed to the active drug.

Additionally, many patients and providers are unaware of the potential impact that excipients may have when selecting therapies and monitoring for adverse events. Currently, the FDA only provides guidance on excipient safety for new products but does not require it unless
specific regulatory or statutory requirements are cited. These guidance documents do not establish legally enforceable responsibilities nor do they require the manufacturer to disclose these excipients unless specifically requested by the FDA. Conversely, the European Union requires manufacturers to declare excipients on labelling if the medicinal product is an injectable, topical, or an eye preparation, as well as requiring excipients known to have a recognized action or effect to be declared on the labelling of all other medicinal products.

Education of manufacturers, pharmacists and other healthcare professionals, and patients regarding the use and potential adverse effects of excipients will be required. Medication-related databases will need to be configured and continuously updated to include information about drug product excipients, and electronic health record systems will need to permit documentation of allergies and medical conditions related to excipients.

2003
ANTICANCER TREATMENT PARITY

Source: Council on Therapeutics

To support anticancer treatment parity legislation at both the state and federal level that ensures equality of access and insurance coverage for all anticancer drug products approved by the Food and Drug Administration (FDA); further,

To advocate all insurers and manufacturers design plans containing limits on out-of-pocket expenditure so that patient cost sharing for anticancer treatment is equivalent, regardless of treatment modality or route of administration; further,

To encourage the development of policies and endorse practices that contribute to a decrease in anticancer treatment costs to the consumer; further,

To continue to foster the development of best practices, including adherence monitoring strategies, and education on the safe use and management of anticancer agents, regardless of route of administration.

This policy supersedes ASHP policy 1516.

Rationale
An estimated $200 billion will be spent on cancer care by 2020, and a recent survey showed if faced with a cancer diagnosis, 57% of Americans say they would be most concerned about either the financial impact on their families or about paying for treatment. Additionally, there is an increase in insurance premiums, co-pays, co-insurance, and deductibles. Most insured cancer patients in the U.S. are responsible for a portion of the cost of their anticancer agents, which can be significant. The average out-of-pocket expense for Medicare patients with cancer is 23.7% of household income. Cancer survivors are 2.7 times more likely to file for bankruptcy.

Traditionally, intravenous (IV) and injected treatments were the primary methods of chemotherapy delivery. Patient-administered anticancer agents have become more prevalent and are now the standard of care for many types of cancer. Oral anticancer agents account for approximately 35% of the oncology development pipeline. Many oral anticancer agents do not
have infusible or injectable alternatives, and are the only treatment option for some cancer diagnoses. Oral agents have been embraced because of convenience, efficacy, and safety, but because insurers cover them differently than intravenous drugs, prescribing oral anticancer agents can impose burdensome levels of cost-sharing on patients.

While IV anticancer treatments are covered under a health plan’s medical benefit, often requiring patients to pay a minimal co-pay or no cost at all for the medication, oral anticancer agents are usually covered under the pharmacy benefits. This results in increased out-of-pocket costs. Cost sharing of oral specialty drugs has increased from 3% in 2004 to 25% in 2013, and continues to rise.

The impact of rising out-of-pocket prescription costs for cancer patients can negatively affect adherence and subsequently treatment outcomes. Co-pays can be hundreds or thousands of dollars per month and, as a result, almost 10% of patients choose not to fill their initial prescriptions for oral anticancer agents. A study of claims data from more than 38,000 people who received a new prescription for one of 38 oral anticancer agents from 2014 to 2015 found that, as out-of-pocket costs rose, fewer patients filled their prescriptions. When the required co-pay was less than $10, only 10% of patients failed to pick up their prescriptions. This increased to 32% for patients whose out-of-pocket costs were between $100 and $500, and to 41% when costs were between $500 and $2000. When the out-of-pocket costs exceeded $2000, nearly half of patients (49%) never filled their prescriptions. Delayed initiation of treatment was also significantly higher for those with higher cost-sharing burdens.

Oral parity is a proposed legislative solution to alleviate coverage discrepancies between oral and intravenous anticancer agents. Parity laws are currently state laws designed to ensure that orally administered agents for treating cancer are not more costly for patients than anticancer agents given via infusion at a clinic or hospital. At this point, 43 states and Washington, DC, have enacted parity laws that require patients to pay no more for an oral cancer treatment than they would for an infusion.

However, state parity laws only apply to certain commercial health insurance plans, including those purchased by small groups and individuals. Self-funded patients, patients covered by health plans that fall under federal law (large, multi-state health plans), or those covered by Medicare and other federally funded insurance plans are not eligible. An estimated fifty percent of cancer patients are currently not protected under state parity laws.

The Cancer Drug Parity Act of 2019 (H.R. 1730, introduced on March 13th, 2019; formerly introduced in 2017 as H.R. 1409) would require any health plan that currently provides coverage for cancer treatment to provide coverage for self-administered anticancer agents at a cost no less favorable than the cost of IV, port-administered, or injected anticancer agents.

There may be false patient perception that oral anticancer agents are less dangerous than IV chemotherapy, furthering supporting the important role of the pharmacist in educating the patients about the agent, its adverse effects, how to manage toxicities, and when to contact their healthcare team. Pharmacists monitor oral chemotherapy treatments to prevent medication and food interactions, adverse drug reactions, and medication errors. Pharmacists are also positioned to play an integral role in shared decision-making and assisting with procurement.
Treatment of cancer also continues to evolve, and many agents may not fall under the category of traditional chemotherapy (e.g., biologic agents, antimicrobials, and others). As a result, practitioners and legislatures have moved away from the singular term chemotherapy and use chemotherapy, anticancer and cancer drug interchangeably, with anticancer being the preferred term.

2004
EVALUATION OF ABUSE-DETERRENT DRUG MECHANISMS
Source: Council on Therapeutics

To encourage manufacturers to develop safe and efficacious abuse-deterrent formulations for drugs known to be abused and misused; further,

To promote research on the efficacy of abuse-deterrent mechanisms in preventing prescription drug abuse, and to support the reporting and dissemination of this information; further,

To advocate for legislation that would limit out-of-pocket expenditures for such formulations.

This policy supersedes ASHP policy 1512.

Rationale
The abuse of certain classes of prescription drugs, including narcotics and stimulants, has had a large impact on public health. One way the Food and Drug Administration (FDA) has sought to curb this activity is through the use of abuse-deterrent formulations (ADFs). ADFs are formulations that permit treatment of a patient’s medical condition but reduce the likelihood of diversion, misuse, and abuse, and related adverse outcomes through various mechanisms, such as hindering the extraction of active ingredients, limiting their bioavailability, preventing administration through alternative routes, or making abuse of the manipulated product less attractive or rewarding.

The FDA has been taking steps to incentivize and support the development of opioid formulations with progressively better abuse-deterrent properties. These steps include working with individual sponsors on promising abuse-deterrent technologies, developing appropriate testing methodologies for both innovator and generic products, and publishing guidance on the development and labeling of abuse-deterrent opioids.

Despite these efforts, prescription stimulants used to treat attention deficit hyperactivity disorder have become drugs of choice for young adults, with as many as 20% of college students using such drugs for nonmedical purposes. According to a 2011 study, benzodiazepines were involved in 30.6% of prescription drug-related overdose deaths. However, to date, the FDA has not provided guidance on ADFs for any controlled substance other than opioids.

Despite the groundswell of support for abuse-deterrent opioid formulations, there is not strong evidence that such formulations deter abuse. One study of 232,874 patients across 437

Click policy number or title to view policy.
*Rationale follows policy language.
facilities found an increase in abuse prevalence of all opioids after introduction of an abuse-deterrent formulation. That study showed little success in deterring abuse, finding instead that patients had switched to alternative drugs. There may also be unintended consequences of preferring abuse-deterrent formulations to regular formulations, such as increased costs borne by patients who legitimately need the drugs.

There also is a need to demonstrate that these formulations are truly abuse deterrent as well. In April 2015, the FDA published an industry guidance document on Abuse-Deterrent Opioids – Evaluation and Labeling. The document explains the FDA’s “current thinking about the studies that should be conducted to demonstrate a given formulation has abuse-deterrent properties.”

Addressing the growing rate of prescription drug abuse will require a multifaceted strategy; no one tactic will solve the problem. While ASHP supports measures such as abuse-deterrent formulations and rescheduling to prevent abuse, more research is necessary to determine which tactics are the most effective at deterring abuse.

2005
QUALITY CONSUMER MEDICATION INFORMATION
Source: Council on Therapeutics

To support efforts by the Food and Drug Administration (FDA) and other stakeholders to improve the quality, consistency, accessibility, targeting, and simplicity of consumer medication information (CMI); further,

To encourage the FDA to work in collaboration with patient advocates and other stakeholders to create evidence-based models and standards, including establishment of a universal literacy level and standardized, patient-focused templates, for CMI; further,

To advocate that research be conducted to validate these models in actual-use studies in pertinent patient populations; further,

To advocate that FDA explore alternative models of CMI content development and maintenance that will ensure the highest level of accuracy, consistency, and currency, and conforms with health literacy requirements; further,

To advocate that the FDA engage a single third-party author to provide editorial control of a highly structured, publicly and easily accessible central repository of CMI in a format that is suitable for ready export; further,

To advocate for laws and regulations that would require all dispensers of medications to comply with FDA-established standards for unalterable content, format, and distribution of CMI.

This policy supersedes ASHP policy 1513.
**Rationale**

ASHP supports the intent of efforts to improve the quality, consistency, and simplicity of consumer medication information (CMI). The Food and Drug Administration (FDA) defines CMI (previously called patient medication information, or PMI) as “written information about prescription drugs developed by organizations or individuals other than a drug’s manufacturer that is intended for distribution to consumers at the time of drug dispensing.” CMI is not reviewed or approved by the FDA or a drug’s manufacturer.

In the 1970s, the FDA began evaluating the usefulness of patient labeling, and in 1996, Public Law 104-180 defined PMI “usefulness” as being “scientifically accurate, unbiased in content and tone, sufficiently specific and comprehensive, presented in an understandable and legible format that is readily comprehensible to consumers, timely and up-to-date, enables the consumer to use the medicine properly and appropriately, receive the maximum benefit, and avoid harm.” In 2002, the National Association of Boards of Pharmacy conducted a study on the usefulness of PMI and that found that 89% of patients in the study received some form of written PMI but that only about 50% of the PMI met the definition of usefulness.

In 2006, the FDA published guidance on useful written CMI. However, because CMI improvement efforts were largely based on consensus of expert opinion, rather than quantitative and well-documented evidence, and because subsequent studies were conducted using expert-based focus groups and other study designs that do not reflect typical patients and under flawed methodology, ASHP encourages the development of evidence-based models for CMI that are designed to support desired outcomes (e.g., better medication use, improved patient safety). In addition, research to validate the effectiveness of any new CMI models under real-use conditions by actual patients, including establishment of a universal literacy level for CMI, should be encouraged. Evidence to establish the essential CMI content needed for the safe and effective use of medications by patients remains to be determined.

Although drug information publishers have made significant progress in improving the quality of CMI, this content is often truncated or provided in illegible formats to accommodate size restrictions or marketing information on patient drug information leaflets that are stapled to prescription packaging.

Because of the FDA’s long history of failure to ensure the consistency, currency, and accuracy of the professional labeling on which CMI would be based; the potential for inclusion of biased or promotional information; and the resulting patient confusion and possible harm, ASHP strongly opposes any proposal for manufacturer-authored CMI that would not be subject to FDA review. Approximately 85% of professional labeling has not been reviewed or updated since 1992 to reflect FDA’s current standard for the Physician Labeling Rule (PLR) format. In addition, numerous inconsistencies and inaccuracies in such labeling continue. Given these limitations, the majority of information on which CMI would be based under such a regime would not be likely to “enhance the safe and effective use of prescription drug products and in turn reduce the number of adverse reactions resulting from medication errors due to misunderstood or incorrectly applied drug information,” which is the main goal of the FDA requirements.

ASHP further advocates that state legislatures and regulatory agencies require that all dispensers distribute CMI according to FDA-established standards and be held accountable if
CMI content or format is modified in a manner that results in nonconformance to the standards.

Creation and maintenance of CMI by a single third-party author (subject to FDA-contracted standards and quality assurance metrics) would provide clear, concise, unbiased, evidence-based CMI that is both timely and consistent for the same drug and for relevant information within the same drug class. Such coordination of the medication information database would allow for consistency in style and content, as well as more frequently updated content.

Due to the evolution of how information is consumed and accessed and in light of the 2009 Health Information Technology for Economic and Clinical Health (HITECH) Act, ASHP also advocates that CMI also be consumable across multiple platforms, including electronic platforms, as more individuals use online medical records to better manage their health and healthcare needs. The Department of Health and Human Services has reported a steady increase in the proportion of individuals who reported having been offered access to their online medical record, with approximately three-quarters of individuals reporting having access to a current list of medications within their online medical record.

2006

PHARMACIST’S LEADERSHIP ROLE IN ANTICOAGULATION THERAPY MANAGEMENT
Source: Council on Therapeutics

To advocate that pharmacists provide leadership in caring for patients receiving drug products for anticoagulant therapy management; further,

To advocate that pharmacists be responsible for coordinating the individualized care of patients receiving drug products for anticoagulation therapy management; further,

To encourage pharmacists who participate in anticoagulation therapy management to educate patients, caregivers, prescribers, and other members of the interprofessional healthcare team about anticoagulant drug product uses, drug interactions, reversal therapies and strategies, adverse effects, the importance of adhering to therapy, access to care, and recommended laboratory testing and other monitoring.

This policy supersedes ASHP policy 1703.

Rationale

As medication experts, pharmacists are well positioned to play a key role in implementation, maintenance, monitoring, management of complications, risk assessment, and assurance of continuity of care for patients receiving medications for management of anticoagulation therapy. Inappropriate medication-related management of anticoagulants creates unnecessary preventable harm.

Since 2008, The Joint Commission National Patient Safety Goals for hospitals have included a requirement for reducing the likelihood of harm associated with anticoagulant therapy. Healthcare facilities were instructed to assign leadership for ensuring compliance with
this requirement, standardize therapeutic practices and protocols, establish monitoring procedures and a drug–food interaction program, individualize care for each patient receiving these treatments, and provide education on the appropriate management of these patients. In 2019, the related elements of performance were revised to address a rise in adverse drug events associated with direct oral anticoagulants (DOACs).

2007

USE OF SURROGATE ENDPOINTS FOR FDA APPROVAL OF DRUG USES

Source: Council on Therapeutics

To support efforts by the Food and Drug Administration (FDA) and other stakeholders to qualify the appropriateness of surrogate endpoints; further,

To support the continued use of qualified surrogate endpoints by the FDA as a mechanism to evaluate the effectiveness and safety of new drugs and new indications for existing therapies, when measurement of definitive clinical outcomes is not feasible; further,

To advocate that the FDA consistently enforce existing requirements that drug product manufacturers complete postmarketing studies for drugs approved based on qualified surrogate endpoints in order to confirm that the expected improvement in outcomes occurs, and to require that these studies be completed in a timely manner.

This policy supersedes ASHP policy 1011.

Rationale

Expedited approval programs provided by the FDA have resulted in substantial public health benefits, as illustrated by the use of surrogate endpoints to approve therapies for HIV and AIDS in the 1990s. The FDA provides four mechanisms to expedite the development and review process for drugs: fast track designation, breakthrough therapy designation, accelerated approval, and priority review designation. The structure and requirements for each of these mechanisms differs as described in a 2013 draft guidance for industry. However, to qualify for any of these programs, a drug must (1) address an unmet medical need, (2) provide benefit over available drug treatments, and (3) be used in the treatment of a serious or life-threatening condition. Further, the FDA guidance states that these programs are “intended to help ensure that therapies for serious conditions are approved and available to patients as soon as it can be concluded that the therapies’ benefits justify their risks.” Processes used to ensure a favorable risk–benefit profile include, but are not limited to, requirements for postmarketing studies to evaluate safety and effectiveness of the drug as used in real-world scenarios. However, the accelerated approval program is the only program that includes postmarketing studies as a requirement of the program. The FDA has discretion to require additional studies on a case-by-case basis for drug products approved via the other expedited mechanisms. Despite these safeguards, some features of these programs (e.g., smaller clinical trials, alternate trial designs, or limited-duration trials) can result in increased patient risk because less is known about a drug’s side effect profile and efficacy due to limited patient exposure. In addition, as with all

Click policy number or title to view policy.
*Rationale follows policy language.
drugs, safety assessments benefit from use of the drug in post-approval patient populations, which better reflect real-world use than the controlled environment of a clinical trial.

Because these drugs represent medical advances, their post-approval use can be extensive. Further, off-label use of these drug products, like all therapies, is common. Unfortunately, prescribers and other clinicians are frequently unaware that an expedited pathway was utilized and that evidence limitations exist. This scenario raises significant concerns about whether there is sufficient clinician awareness to ensure appropriate use of drugs approved via these pathways. Therefore, ASHP proposes unique labeling requirements that would increase awareness through use of a logo or other mechanism that would be used on an interim basis to inform clinicians about data limitations and provide guidance on appropriate use. This labeling would describe appropriate patient populations and monitoring parameters. Similar labeling requirements have been proposed for a new pathway being considered for the development of antibiotics used to treat life-threatening infections. ASHP supports the approach, but recommends that the increased labeling requirements be discontinued once the drug product manufacturer and FDA agree that sufficient data is available to support safe and effective use, or after the drug manufacturer completes any required postmarketing study commitments.

Given data limitations associated with approval of these therapies, ASHP advocates that the FDA be extremely diligent in ensuring that postmarketing commitments are met. Further, the FDA should use its existing authority as described under 21 CFR 314 subpart H and 21 CFR 601 subpart E if timelines or expectations for these commitments are not satisfactory. This authority allows the FDA to take legal action through penalties that include requiring labeling changes or rescinding marketing approval.

Finally, ASHP believes that there is a need for research to determine whether these expedited pathways are achieving the desired benefits, which include decreasing the time and costs associated with drug product development, lowering overall healthcare costs, and increasing patient access to safe and effective drug therapies.

2008
HEALTH-SYSTEM FACILITY DESIGN
Source: Council on Pharmacy Management

To advocate the development and the inclusion of contemporary pharmacy and medication-use specifications in national and state healthcare design standards to ensure adequate space for safe provision of pharmacy products and patient care services; further,

To promote pharmacist involvement in the design-planning and space-allocation decisions of healthcare facilities.

This policy supersedes ASHP policy 0505.

Rationale
Often the design and location of health-system pharmacy departments are less than ideal. Many pharmacy departments do not have adequate square footage, and too often the
pharmacy is located in the basement of the hospital, far removed from the patients. The impact of physical space on staff satisfaction may also contribute to staff turnover. Pharmacy design often occurs before pharmacy leadership has an opportunity for input on the design, location, or size.

Healthcare architects and facility engineers need to be knowledgeable in the contemporary and future needs of pharmacy design and the facility requirements for medication use (e.g., medication preparation rooms, temperature monitoring, automated dispensing cabinets). This includes, for instance, the inclusion of technical specifications (including those in applicable compendial standards of the United States Pharmacopeia) for pharmacies in national healthcare design standards.

Regarding facility design, pharmacist collaboration with the Association of Healthcare Engineers and the American Institute of Architects is paramount to design success. The Guidelines for Design and Construction of Hospital and Health Care Facilities is the primary document driving design decisions by architects and healthcare engineers. Research results on optimal, evidenced-based facility design to support safe medication use should be incorporated in new or renovation construction plans.

2009
ROLE OF THE PHARMACY WORKFORCE IN IDENTIFYING AND CARING FOR VICTIMS OF HUMAN TRAFFICKING
Source: Council on Pharmacy Practice

To recognize that human trafficking is a significant public health problem in the U.S.; further,

To affirm that the pharmacy workforce has important roles in identifying and caring for victims of human trafficking; further,

To foster education, training, and the development of resources to prepare the pharmacy workforce for their roles in identifying and caring for victims of human trafficking.

Rationale
The U.S. Department of Health and Human Services Office on Trafficking in Persons (OTIP) describes human trafficking as a form of modern slavery that "occurs when a trafficker exploits an individual with force, fraud, or coercion to make them perform commercial sex or work." OTIP outlines two types of trafficking: labor trafficking, in which individuals are compelled to work or provide services; and sex trafficking, in which "adults are compelled to engage in commercial sex by force, fraud, or coercion or minors are compelled to perform a commercial sex act regardless of the presence of force, fraud, or coercion."

Combating human trafficking is one of the central goals of the American Hospital Association Hospitals Against Violence Initiative. All healthcare providers have a role in identifying and caring for victims of human trafficking. These roles include recognizing indicators of human trafficking; being aware of common healthcare issues faced by human trafficking victims; providing for a patient’s medical and nonmedical needs while providing a
safe and comfortable environment; complying with applicable laws regarding reporting of suspected human trafficking, including child abuse; and providing care and resources for survivors of human trafficking.

2010

**Use of Two Patient Identifiers in the Outpatient Setting**

*Source: Council on Pharmacy Practice*

To encourage the use of two identifiers to confirm patient identity when transferring filled prescriptions to the possession of the patient or patient’s agent for outpatient use.

*This policy supersedes ASHP policy 1024.*

**Rationale**

Errors caused by dispensing medications to the wrong patient are largely preventable. Although two patient identifiers are routinely used when medications are administered in inpatient settings, similar practices are not employed when dispensing medications for outpatient use. ASHP supports consistent use of two patient identifiers and believes that this safety strategy should be used to confirm patient identity at the time patients or their agents pick up filled prescriptions for outpatient use.

2011

**CREDENTIALING AND PRIVILEGING BY REGULATORS, PAYERS, AND PROVIDERS OF COLLABORATIVE PRACTICE**

*Source: Council on Public Policy*

To recommend the use of credentialing and privileging in a manner consistent with other healthcare professionals to assess a pharmacist’s competence to engage in patient care services.

*This policy supersedes ASHP policy 1907.*

**Rationale**

Credentialing and privileging processes are key to ensuring clinician competence to provide safe and effective patient care. They are also critical elements to securing reimbursement for healthcare services. ASHP opposes the development of credentialing or privileging processes by government agencies or payers without significant pharmacist input. We recognize that state laws, state boards of pharmacy, and payers will each approach credentialing and privileging differently, making a consistent process extremely beneficial. When possible, pharmacists should be included as providers in medical staff bylaws.

2012

**IMPORTATION OF DRUG PRODUCTS**

*Source: Council on Public Policy*

To oppose wholesale importation of drug products as a method to lower drug costs.
Rationale
Recent efforts to rein in drug pricing have centered on proposals to allow the wholesale importation of drugs (meaning importation of drugs by healthcare providers and distributors on a larger scale, rather than by individuals on a small scale) from foreign countries (e.g., Canada) as a means to reduce patient costs. Although states (e.g., Florida and Colorado) have passed wholesale importation laws, those laws cannot take effect until the state has crafted an importation plan, the Food and Drug Administration (FDA) has signed off on it, and the Department of Health & Human Services (HHS) Secretary has made the required certification to Congress.

Current law allows wholesale importation only in very limited circumstances (i.e., shortages) and requires the HHS Secretary to certify to Congress that allowing importation of drugs will not put public health and safety at risk and that it will result in significant savings. No Secretary has ever been able to make such a certification.

ASHP believes that wholesale importation of drugs cannot be accomplished while: (1) maintaining the integrity of the pharmaceutical supply chain and avoiding the introduction of counterfeit products into the U.S.; (2) providing for continued patient access to pharmacist review of all medications and preserving the patient-pharmacist-prescriber relationship; and (3) providing adequate patient counseling and education, particularly to patients taking multiple high-risk medications. Further, wholesale importation is unlikely to result in significant cost savings and reduces focus on drug pricing solutions that can reduce prices over the long term.

Nothing in this policy should be construed to oppose personal importation of drugs, or importation of drugs and related medical devices to alleviate a drug shortage when such importation is overseen by the FDA.
provide data to justify that stance. The arguments against requiring monographs center on their potential use as a barrier to competition, because manufacturers could incorporate patentable characteristics relevant to the product’s safety and efficacy. However, removing monographs for one class of drugs could open the door to removal of standards for other drug classes and to laxer safety standards generally. There is evidence that the monographs do not dampen innovation, as new products continue to enter the market.

2014
**NALOXONE AVAILABILITY**
*Source: Council on Therapeutics*

To recognize the public health benefits of naloxone for opioid reversal; further,

To support efforts to safely expand patient and public access to naloxone; further,

To support state efforts to authorize pharmacists’ prescribing authority for naloxone for opioid reversal; further,

To advocate for the development of affordable formulations of naloxone to increase accessibility; further,

To foster standardized education on the role of naloxone in opioid reversal and its proper administration, safe use, and appropriate follow-up care; further,

To support legislation that provides protections for those seeking or providing medical help for overdose victims.

*This policy supersedes ASHP policy 1510.*

**Rationale**

According to the Centers for Disease Control and Prevention (CDC), prescription drug abuse is a national epidemic. Deaths from prescription opioid overdose number 10,000 per year; in contrast, deaths from heroin overdose number 2000. People at risk for opioid overdose include not only substance abusers, but also opioid-naïve patients, such as those being admitted for or discharged from ambulatory surgery.

Naloxone is a competitive opioid antagonist that rapidly rescues patients from opioid overdose by displacing mu2 opioid receptors in the central nervous system. Naloxone has an excellent safety profile. The World Health Organization includes naloxone on its model list of essential medicines.

Evidence has demonstrated a clear public health benefit from expanding access to naloxone. Naloxone is currently distributed without a prescription via standing orders, collaborative practice agreements or pharmacist prescribing authority in all 50 states to ensure liberal access to this lifesaving drug. Several states have also started to permit pharmacy technicians to dispense naloxone under these provisions as well.
Currently there are several formulations of naloxone on the market, including subcutaneous injection, something caregivers or peers may have difficulty doing properly, and intranasal formulations. These nasal devices have shown that intranasal naloxone is as effective as injectable routes in rapid opioid reversal. However, its cost (which ranges from $130 to $300 per kit) presents a barrier to widespread use. ASHP encourages the Food and Drug Administration to explore ways to get more user-friendly and less costly formulations to the market for patients and caregivers.

Despite this expanded access to naloxone, there are still significant barriers to its widespread use, including hesitancy among pharmacists to dispense naloxone. Uniform education for those administering the drug, training on safe administration, and recommendations on follow-up care with abuse treatment programs for treated individuals is needed. Laws, including medical amnesty and those that provide protection against legal liability for persons administering naloxone (i.e., Good Samaritan laws), are needed as well as laws protecting individuals who call for help for someone who has overdosed from prosecution from minor drug possession or drug paraphernalia.

2015
NETWORK CONNECTIVITY AND INTEROPERABILITY FOR CONTINUITY OF CARE
Source: Council on Pharmacy Management
To advocate the use of electronic information systems, with appropriate security controls, that enable the integration of patient-specific data that is accessible in all components of a health system; further,

To support the use of technology that allows the transfer of patient information needed for appropriate medication management across the continuum of care; further,

To urge computer software vendors and pharmaceutical suppliers to provide standards for definition, collection, coding, and exchange of clinical data used in the medication-use process; further,

To pursue formal and informal liaisons with appropriate healthcare associations to ensure that the interests of patient care and safety in the medication-use process are fully represented in the standardization, integration, and implementation of electronic information systems; further,

To strongly encourage health-system administrators, regulatory bodies, and other appropriate groups to provide health-system pharmacists with full access to patient-specific clinical data; further,

To advocate that client-vendor agreements include timelines for data destruction; further,

To oppose the selling of data for unauthorized uses; further,
To educate health-system leaders about potential use and misuse of shared data.

*This policy supersedes ASHP policy 0507.*

**Rationale**

For the past two decades, the U.S. health system has been racing to take advantage of the potential that digital health information offers for improved patient care. Each institution and practice has invested in information systems that work for its specific situation. These systems were developed by multiple vendors, each with their own proprietary structures and labels. Information was and continues to be found in silos, within health systems, within institutions, even within departments.

In 2004, an executive order created the Office of the National Coordinator for Health Information Technology (ONC). ONC is the primary federal entity charged with coordination of nationwide efforts to implement and advance health information technology and the electronic exchange of health information. The 2009 *Health Information Technology for Economic and Clinical Health (HITECH) Act* provided the Department of Health and Human Services with additional authority to promote health information technology, including the secure exchange of electronic health information.

As defined by the Healthcare Information and Management Systems Society (HIMSS), interoperability is “the ability of different information systems, devices, or applications to connect, in a coordinated manner, within and across organizational boundaries to access, exchange and cooperatively use data amongst stakeholders, with the goal of optimizing the health of individuals and populations.” ONC has developed a roadmap for interoperability and created calls to action for entities with specific roles in our healthcare system (e.g., the *Calls to Action for People and Organizations That Deliver Care and Services*).

As government agencies, standards-setting organizations, and professional associations work toward interoperability of health information technology, it is important to ensure this includes the ability of healthcare providers and patients to securely access and use health information from different sources and settings relevant to medication use to ensure patient-centered continuity of care.

Along with secure access and sharing of health information, providers and health systems must be cognizant of how a vendor will handle data, how it plans to safeguard data, and whether and how data will be used for secondary purposes (e.g., research, advertising).

ASHP recognizes that continuity of care is a vital requirement in the appropriate use of medications. Pharmacists have responsibility for ensuring continuity of care as patients move from one setting to another (e.g., ambulatory care, inpatient care, community pharmacy, home care). Achieving information systems that have the ability to share relevant patient care data securely across care settings is a critical step in optimizing medication use across care settings.

**2016**

**MEDICATION FORMULARY SYSTEM MANAGEMENT**

*Source: Council on Pharmacy Management*
To declare that decisions on the management of a medication formulary system, including criteria for use, (1) should be based on clinical, ethical, legal, social, philosophical, quality-of-life, safety, comparative effectiveness, and pharmacoeconomic factors that result in optimal patient care; (2) must include the active and direct involvement of physicians, pharmacists, and other appropriate healthcare professionals; and (3) should not be based solely on economic factors; further,

To support the concept of a standardized medication formulary system among components of integrated health systems when standardization leads to improved patient outcomes; further,

To oppose independent payer-directed formulary decisions that would increase the complexity of the medication-use system.

This policy supersedes ASHP policies 9601 and 1805.

Rationale
A formulary is a continually updated list of medications and related information, representing the clinical judgment of pharmacists, physicians, and other experts in the diagnosis and treatment of disease and promotion of health. A formulary includes, but is not limited to, a list of medications, standardized medication concentrations, and medication-associated products or devices, medication-use policies, important ancillary drug information, decision-support tools, and organizational guidelines. The multiplicity of medications available, the complexities surrounding their safe and effective use, and differences in their relative value make it necessary for healthcare organizations to have medication-use policies that promote rational, evidence-based, clinically appropriate, safe, and cost-effective medication therapy. The formulary system is the ongoing process through which a healthcare organization establishes policies on the use of drugs, therapies, and drug-related products and identifies those that are most medically appropriate and cost-effective to best serve the health interests of a given patient population.

As described in more detail in the ASHP Statement on the Pharmacy and Therapeutics Committee and the Formulary System, a fundamental characteristic of the formulary system is that all decisions are made based on factors that result in optimal patient care, include the involvement of appropriate healthcare professionals, and are not based solely on economic factors.

Formulary management techniques may differ under an integrated or network system versus an individual healthcare entity. Standardized drug formularies within integrated health systems increase coordination complexity, but help drive standardized medication use processes across sites of care.

Additionally, insurance coverage of medications should not interfere with the safe and effective provision of care. For example, some hospitals are currently being forced to administer a specific payer-preferred biosimilar drug to a covered patient, which requires hospitals to stock a different product for each payer and then ensure the correct one is
dispensed. This costly and resource-intensive practice also has medication safety implications and negatively affects supply chain efficiency. Biosimilar drugs are considered to be therapeutically equivalent, but the current Food and Drug Administration (FDA) approval process does not include a determination of interchangeability between reference and biosimilar products. Because the substitution of a biosimilar for a reference product is a decision outside the FDA regulatory process, it is therefore a matter of state pharmacy law. The obligation to have a specific payer-preferred biosimilar results in hospitals and health systems devoting significant resources to procure, store, label, and dispense payer-preferred biosimilars. This duplication adds complexity to the medication-use process, and as more biosimilars become available, the potential for harmful medication errors will increase. The use of biosimilars was a key cost-reduction concept in the Affordable Care Act. However, in May 2018, the price linkage cost-reduction concept within Medicare Part B was rescinded. Going forward, reimbursement will be based on the specific biosimilar product pricing. The full impact of this change for individual healthcare organizations will depend on patient and payer mix. Biosimilars that are priced at a lower acquisition cost compared to the innovator product are likely to stagnate or lose market share due to a low reimbursement margin. As a result, pricing of biosimilars may increase to make the reimbursement margin competitive with the innovator product, leaving healthcare organizations in search of other cost reduction opportunities.

2017
ROLE OF THE PHARMACY WORKFORCE IN PREVENTING ACCIDENTAL AND INTENTIONAL FIREARM INJURY AND DEATH

Source: Council on Pharmacy Practice

To recognize that accidental and intentional firearm injury and death in the U.S. is a public health crisis; further,

To affirm that the pharmacy workforce has important roles in the comprehensive public health and medical approach to reducing death and disability from firearm injury.

Rationale
A formulary is a continually updated list of medications and related information, representing the clinical judgment of pharmacists, physicians, and other experts in the diagnosis and treatment of disease and promotion of health. A formulary includes, but is not limited to, a list of medications, standardized medication concentrations, and medication-associated products or devices, medication-use policies, important ancillary drug information, decision-support tools, and organizational guidelines. The multiplicity of medications available, the complexities surrounding their safe and effective use, and differences in their relative value make it necessary for healthcare organizations to have medication-use policies that promote rational, evidence-based, clinically appropriate, safe, and cost-effective medication therapy. The formulary system is the ongoing process through which a healthcare organization establishes policies on the use of drugs, therapies, and drug-related products and identifies those that are most medically appropriate and cost-effective to best serve the health interests of a given patient population.

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*Rationale follows policy language.
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**2018**

**SAFE USE OF TRANSDERMAL SYSTEM PATCHES**

*Source: Council on Pharmacy Practice*

To encourage hospitals and health systems to implement policies and procedures to ensure safe use of transdermal system patches; further,

To advocate for enhanced patient and consumer education and product safety requirements for transdermal system patches; further,
To encourage manufacturers of transdermal system patches to collaborate with pharmacists and other stakeholders to identify and implement packaging, labeling, and formulation changes that prevent accidental exposure and facilitate safe disposal.

*This policy supersedes ASHP policy 1404.*

**Rationale**

There have been many reports of errors associated with and abuse or misuse of transdermal system patches. Pharmacists are in a unique position to improve the safe use of these products by encouraging implementation of best practices such as electronic health record builds; regular nursing checks for transdermal patches; and policies for ordering, handling, and disposal of these products. Better patient and consumer education specific to this unique dosage form, especially for outpatient use, is also an important component of safe use. Manufacturers could also take additional steps to prevent misuse of these products by collaborating with pharmacists and other stakeholders to identify and implement packaging, labeling, and formulation changes that would facilitate safe disposal and prevent accidental exposure.

2019

**ACCESS TO AFFORDABLE HEALTHCARE**

*Source: Council on Public Policy*

To advocate for access to affordable healthcare for all, including coverage of medications and related pharmacist patient care services; further,

To advocate that the full range of available methods be used to (1) ensure the provision of appropriate, safe, and cost-effective healthcare services; (2) optimize treatment outcomes; (3) minimize overall costs without compromising quality; and (4) ensure patient choice of healthcare providers, including pharmacy services; further,

To advocate that healthcare payers seek to optimize continuity of care in their design of benefit plans.

*This policy supersedes ASHP policy 1001.*

**Rationale**

This policy expresses ASHP’s stance on access to healthcare in the United States. The policy emanated from ASHP policies dealing with affordability and accessibility of pharmaceuticals. ASHP believes that it is important to address the larger issue of healthcare access, particularly due to the impact of the cost of medications on the nation’s overall healthcare budget as well as pharmacy budgets in hospitals and health systems. Healthcare should be affordable, but also sufficient to ensure patient access to services.

2020

**CARE-COMMENSURATE REIMBURSEMENT**
To advocate that reimbursement for healthcare services be commensurate with the level of care provided, based on the needs of the patient.

**Rationale**
As a means to reduce costs for federal programs, the Centers for Medicare & Medicaid Services (CMS) has been aggressively expanding efforts to reduce reimbursement at certain sites of care. Specifically, CMS has cut reimbursement for care services provided at hospital outpatient departments to match the rate paid physicians’ offices. CMS refers to this policy as “site-neutral payment.” On the basis of site neutrality, CMS also extended cuts to hospital reimbursement for drugs purchased under the 340B drug discount program to hospital outpatient departments. Private payers have also sought to impose site-neutral payment policies.

Reimbursement for services should reflect unique factors associated with a site of care. Hospital outpatient departments are held to higher quality standards with more oversight than what is often required for alternate sites of care. In addition to the Medicare Conditions of Participation, hospital outpatient departments must meet accreditation, United States Pharmacopeia (USP), and even Food and Drug Administration requirements. These standards result in high-quality patient care, but at a higher cost than what can be accomplished without the oversight.

Patients may also derive benefits from receiving care at a hospital outpatient department. Hospital care delivery models are crafted to ensure that patients receive the highest quality care possible. For hospitals that belong to an accountable care organization or are otherwise part of an integrated network, seeing patients at the outpatient department allows providers to better coordinate care, resulting in improved patient outcomes. Care provided in this setting is often highly complex and complementary to acute care that the patient receives from the hospital. Drastic cuts to hospital outpatient reimbursement could endanger the long-term viability of these care delivery models – if services are cut or outpatient departments are closed, patient access will suffer.

**2021**

**FUNDING, EXPERTISE, AND OVERSIGHT OF STATE BOARDS OF PHARMACY**

*Source: Council on Public Policy*

To advocate appropriate oversight of pharmacy practice and the pharmaceutical supply chain through coordination and cooperation of state boards of pharmacy and other state and federal agencies whose mission it is to protect the public health; further,

To advocate representation on state boards of pharmacy and related agencies by pharmacists and pharmacy technicians; further,

To advocate that hospitals and health systems are adequately represented on state boards of pharmacy; further,
To advocate for dedicated funds for the exclusive use by state boards of pharmacy and related agencies including funding for the training of state board of pharmacy inspectors and the implementation of adequate inspection schedules to ensure the effective oversight and regulation of pharmacy practice, the integrity of the pharmaceutical supply chain, and protection of the public; further,

To advocate that inspections be performed only by individuals with demonstrated competency in the applicable area of practice.

This policy supersedes ASHP policy 1507.

Rationale
In recent years, the regulatory scope of boards of pharmacy has grown to address new and expanded scopes of practice and healthcare while fulfilling their mission of protecting the public health. In addition, coordination with federal agencies (e.g., Food and Drug Administration, Drug Enforcement Administration) and related state agencies add to the complexity of a state board’s mission. With this expanded scope and mission comes the need for additional resources, both financial and human. Specific knowledge acquired by pharmacists and pharmacy technicians is essential to the safe regulation of practice. Thus, inspectors need to have demonstrated competency in the applicable area of practice in order to assure the health and safety of the public.

2022
DISPENSING BY NONPHARMACISTS AND NONPRESCRIBERS
Source: Council on Public Policy
To reaffirm the position that to ensure optimal patient outcomes all medication dispensing functions must be performed by, or under the supervision of, a pharmacist; further,

To reaffirm the position that any relationships that are established between a pharmacist and other individuals in order to carry out the dispensing function should preserve the role of the pharmacist in (a) maintaining appropriate patient safety, (b) complying with regulatory and legal requirements, and (c) providing individualized patient care; further,

To advocate that all medication dispensing, regardless of setting, be held to the same regulatory standards that apply to dispensing by a pharmacist; further,

To urge pharmacists to assume a leadership role in medication dispensing in all settings to ensure adherence to best practices.

This policy supersedes ASHP policy 0010.

Rationale
The Council recognizes the reality of limited pharmacist availability and lack of comprehensive
pharmacy services in many settings, including public health clinics, rural and urban outreach clinics, and hospital emergency departments. However, the Council believes that responsibility and services of pharmacists are critical to safe medication use and that all dispensing, regardless of setting, should meet the same standards that apply to pharmacies and pharmacists. The Council believes that the current ASHP Minimum Standard for Pharmaceutical Services in Ambulatory Care is explicit and pertinent to the practice of dispensing by nonpharmacists and nonprescribers. The Council also noted that this type of drug delivery and dispensing arrangement does not constitute collaborative drug therapy management as defined in ASHP policy 9903.

2023
NEW CATEGORIES OF LICENSED PHARMACY PERSONNEL
Source: Council on Public Policy
To oppose the creation of new categories of licensed pharmacy personnel.

Rationale
State efforts to introduce a “pharmacist assistant” category conflict with longstanding ASHP efforts to support the professional growth of licensed or registered pharmacy technicians. Pursuant to these state proposals, pharmacists could delegate a number of activities that fall under the purview of their practice to the pharmacist assistant, such as receiving telephone calls, prescriptions, tech-check-tech, etc. In effect, this would create another midlevel provider in the pharmacy. Not only would this create confusion regarding terminology and job roles, it would undermine ASHP’s work to professionalize the technician role. The policy should not be read as impeding the use of current licensed personnel, including technicians and students.

2024
SAFETY AND EFFICACY OF COMPOUNDED TOPICAL FORMULATIONS
Source: Council on Therapeutics
To encourage pharmacists to take a leadership role in developing processes that would ensure quality, safety, and effectiveness of compounded topical formulations; further,

To advocate that ASHP expand its repository of evidence-based formulations that could serve as a resource for compounding topical formulations; further,

To advocate that public and private payers and healthcare providers collaborate to create standardized and efficient methods for authorizing payment for medically necessary compounded topical formulations; further,

To encourage hospitals and health systems to develop policies and procedures to guide clinicians in making informed decisions regarding the prescribing and use of compounded topical formulations; further,
To encourage pharmacists to take a leadership role in developing and providing education on the safety and efficacy of compounded topical formulations to providers and consumers.

**Rationale**

Compounded topical formulations are meant to be customized for individuals whose needs cannot be met by commercially available drugs. Unlike the drugs made by conventional manufacturers that require Food and Drug Administration (FDA) approval, compounded drugs such as various topical formulations are not evaluated by the FDA for safety, effectiveness, or quality, and many are exempt from the new-drug approval process, current good manufacturing practice, and other FDA requirements. In addition, quality standards for compounded drugs are generally lower than those for FDA-approved drugs; therefore, compounded drugs can pose increased safety risks (e.g., being contaminated or having the wrong potency) or lack efficacy.

Because some drugs do have FDA approval for topical application, clinicians and patients may not be aware of potential safety risks or potential lack of effectiveness associated with certain ingredients and combinations of ingredients in compounded topical pain creams. When these agents are compounded, at least one of the ingredients is an active ingredient in an FDA-approved topical pain cream (e.g., lidocaine), while the remaining ingredients may be active ingredients in drugs approved by the FDA for nontopical administration to treat non-pain-related indications (e.g., antidepressants, anticonvulsants, antivirals, narcotics). In addition, the literature supporting the use of the additional agents outside their normal vehicle of administration is often not well designed or sufficiently powered to demonstrate efficacy. A study published by the U.S. Department of Defense found that these combination-compounded pain creams were no better than placebo creams and, given their higher costs, which had escalated to cost of $6 million per day, should no longer be used.

Issues of fraud are also well known with compounded topical formulations. In August 2018, the Department of Health and Human Services Office of Inspector General (OIG) found that from 2006 to 2015, spending for these drugs increased 625%, and spending for compounded topical drugs—such as creams, gels, and ointments—grew at an even faster pace. Medicare Part D sponsors cover these drugs under certain circumstances. The OIG also found that Part D spending for compounded topical drugs increased 2353% from 2010 to 2016, rising from $13.2 million to $323.5 million. Much of this growth occurred from 2014 to 2016, when spending increased by more than $200 million and raised concerns that the drugs that were billed to Part D were not always dispensed or medically necessary. Upon investigation, the OIG found that many of the parties charging Part D were located in a handful of cities, with thousands of prescriptions written by a single provider and filled by a limited number of pharmacies. This led HHS to conclude that the prescribers may not have had legitimate doctor-patient relationships with the beneficiaries.

Given these challenges, pharmacists will need to assume a leadership role in developing processes to ensure the quality, safety, and effectiveness of compounded topical formulations, including developing and providing education on compounded topical formulations for providers and consumers, and expanding the ASHP repository of evidence-
based formulations. Public and private payers and healthcare providers will need to collaborate to create standardized and efficient methods for authorizing payment for medically necessary compounded topical formulations, and hospitals and health systems will need to develop policies and procedures to guide clinicians in making informed decisions regarding prescribing and use of compounded topical formulations.

2025
POSTMARKETING STUDIES
Source: Council on Therapeutics

To advocate that Congress grant the Food and Drug Administration (FDA) authority to require the manufacturer of an approved drug product or licensed biologic product to conduct postmarketing studies on the safety of the product when the agency deems it to be in the public interest and to require additional labeling or withdrawal of the product on the basis of a review of postmarketing studies; further,

To advocate that Congress provide adequate funding to FDA and other agencies to fulfill this expanded mission related to postmarketing surveillance and studies; further,

To advocate that such studies compare a particular approved drug product or licensed biologic product with (as appropriate) other approved drug products, licensed biologic products, medical devices, or procedures used to treat specific diseases; further,

To advocate expansion of studies of approved drug products or licensed biologic products to improve safety and therapeutic outcomes and promote cost-effective use; further,

To encourage impartial public-private partnerships or private-sector entities to also conduct such studies.

This policy supersedes ASHP policies 1004 and 0515.

Rationale
Pharmacists, other members of the healthcare team, patients, and private and public payers need objective, authoritative, and reliable evidence to make the best treatment decisions. Since the passage of the Medicare Prescription Drug, Improvement and Modernization Act of 2003, the Agency for Healthcare Research and Quality (AHRQ) has been tasked with studying the outcomes, comparative clinical effectiveness, and appropriateness of healthcare items and services. For such research to contribute to the practice of evidence-based patient care, good clinical decision-making, and rational drug use, AHRQ must evaluate devices, invasive procedures, and prescription and nonprescription medications, including both labeled and unlabeled uses of prescription drugs. Since prescription drugs represent a significant and growing portion of healthcare costs, the need for such research is increasingly important. Although impartial private sector entities can supplement the research efforts of government agencies such as AHRQ, only the federal government has the ability to support such
independent research, provide oversight to safeguard the integrity of the research process, and disseminate the findings.

Furthermore, to ensure safety, the Food and Drug Administration (FDA) has several requirements for manufacturers and programs in place to monitor postmarket adverse events. These requirements and programs include the Division of Medication Error Prevention and Analysis, which is responsible for monitoring and preventing medication errors related to the naming, labeling, packaging, and design for CDER-regulated drugs and therapeutic biological products; the Risk Evaluation and Mitigation Strategy (REMS) program, which is designed to help reduce the occurrence and severity of certain serious risks; by informing and supporting the execution of the safe use conditions described in the medication's FDA-approved prescribing information; the Safe Use Initiative, a program that aims reduce preventable harm by identifying specific, preventable medication risks and developing, implementing, and evaluating cross-sector interventions with partners who are committed to safe medication use. Other programs include the FDA Adverse Event Reporting System (FAERS), which is a database that contains adverse event reports, medication error reports, and product quality complaints resulting in adverse events that were submitted to FDA, and MedWatch, the FDA Safety Information and Adverse Event Reporting Program, which permits voluntary reporting by consumers and healthcare professionals and mandatory reporting for regulated industry and user facilities. Additionally, the FDA requires that adverse drug events (ADEs) must be reported in accordance with the requirements of 21 CFR 310.305 and 314.80, which require three types of ADE reports: (1) 15-day reports of serious, unlabeled events; (2) 15-day narrative increased frequency reports of serious, labeled events; and (3) periodic reports.

2026
GABAPENTIN AS A CONTROLLED SUBSTANCE
Source: Council on Therapeutics

To advocate that the Drug Enforcement Administration classify gabapentin as a Schedule V substance due to its potential for abuse and patient harm.

Rationale
Gabapentin is a structural analog of gamma-aminobutyric acid that is approved by the Food and Drug Administration (FDA) for post-herpetic neuralgia and as an adjunctive therapy for partial seizures. Gabapentin has been identified as an opportunistic drug of abuse which, when used in conjunction with other medications, particularly opioids, may result in serious adverse events such as respiratory depression and even death. Gabapentin is used due to its low cost, classification as a noncontrolled substance, and increasing rates of on- and off-label prescribing attributable to clinicians’ desire for an alternative to opioids for pain management. In the U.S., gabapentin is and remains a noncontrolled substance at the federal level despite evidence suggestive of diversion and abuse with opioids. Most recently, several states have made an effort to combat the diversion and abuse of gabapentin by examining various regulatory approaches, such as reclassification of gabapentin as controlled substance or mandating the reporting of the prescribing and/or dispensing of gabapentin to a state-level prescription drug monitoring programs (PDMPs). As recently as April 2019, the United Kingdom reclassified...
gabapentin as a Class C controlled substance, which required similar dispensing and monitoring as controlled substances in the U.S., due to the increase in abuse they have seen in this drug.

As defined by the Drug Enforcement Administration (DEA), Schedule V controlled substances “are defined as drugs with lower potential for abuse than Schedule IV” substances. Schedule IV substances “are defined as drugs with a low potential for abuse and low risk of dependence.” Recent data from multiple sources have shown a significant increase in gabapentin misuse, abuse, and diversion over the past 10 years, and one study found that 22% of a sample of 162 opioid-dependent patients had a prescription for gabapentin, of which 40% indicated they used more than prescribed to augment and enhance their opioid experiences.

The criteria used by DEA to determine whether to control or reschedule a drug include (a) the drug’s actual or relative potential for abuse; (b) scientific evidence of its pharmacological effect, if known; (c) the state of current scientific knowledge regarding the abuse of the drug or other substance; (d) its history or current pattern of abuse; (e) the scope, duration, and significance of abuse; (f) what, if any, risk there is to public health; (g) its psychic or physiological dependence liability; and (e) whether the substance is a precursor of a substance already controlled under the law. Based on an assessment using these criteria, gabapentin is similar to other controlled substances found in Schedule V and should therefore be assigned to Schedule V. Because some states have already taken steps to reschedule gabapentin as Schedule V or have added it to their PDMPs, the DEA should take steps to change the schedule status of gabapentin to ensure continuity of care and monitoring.

While it is difficult to predict the impact rescheduling may have on abuse, the current extent of abuse is likely exacerbated by easy access to and excessive supply of these therapies. However, the potential public health benefit of rescheduling must be weighed against concerns about restricting patients’ access to treatment and increasing administrative and other burdens on pharmacists and other clinicians. The proposed change to a more restrictive schedule would require stricter recordkeeping and security processes, which could in turn make providers reluctant to prescribe these therapies for patients who need pain management. In balancing these concerns, it should be noted that increased control of drugs with abuse potential is in the best interests of patients and public health. DEA and other stakeholders should monitor the impact of this scheduling change on patient access and practice, as well as monitor the impact of other strategies that have been implemented to minimize the abuse and diversion of these therapies.

2027
RESIDENCY TRAINING FOR PHARMACISTS WHO PROVIDE DIRECT PATIENT CARE
Source: Council on Education and Workforce Development

To recognize that optimal direct patient care by a pharmacist requires the development of clinical judgment, which can be acquired only through experience and reflection on that experience; further,

Pharmacists who provide direct patient care should have completed an ASHP-accredited residency or have attained comparable skills through practice experience; further,
To support the position that the completion of an ASHP-accredited postgraduate-year-one residency be required for all new college or school of pharmacy graduates who will be providing direct patient care.

*This policy supersedes ASHP policies 0701 and 0005.*

**Rationale**
Pharmacists who engage in direct patient care can improve patient outcomes and significantly decrease the overall costs of the healthcare system. Completion of a postgraduate pharmacy residency enables a pharmacist to maximize the provision of these direct patient care services. The use of well-trained pharmacy technicians and technological advances will minimize pharmacists’ dispensing roles. Based on the assumption that in the next 20-30 years most pharmacists will be providing direct patient care, it is incumbent upon the pharmacy profession to ensure that pharmacists are in a position to make the most effective interventions when selecting, modifying, and monitoring patients’ drug therapy regimens.

Pharmacy students who graduate meet the minimum competency requirements based on pharmacy licensing examinations; however, pharmacists who have completed a residency are better equipped to provide direct patient care due to advanced training based on repetitive practice, preceptor guidance, and the additional interdisciplinary training they receive. This direction is consistent with ASHP’s Long-Range Vision for the Pharmacy Workforce in Hospitals and Health Systems.

Similar to the medical model in which medical school graduates complete a residency that allows for the standardization of physician training and the attainment of an appropriate level of competency, the profession of pharmacy would benefit from a similar standardization of training. The value of pharmacy residency programs has been demonstrated over time and has stimulated a significant increase in accredited residency programs as well as employer demand for residency-trained pharmacists. An increasing number of pharmacy graduates are completing one or two years of residency training after graduating in order to bolster their clinical skills and develop clinical judgement, which is acquired only through experience and reflection on that experience.

The number of PGY1 residencies continues to grow with the number of available residencies in the U.S. is now nearly 2600 programs. The growth in the number of pharmacy school graduates has begun to plateau while PGY1 residency positions has grown 11% in the last three years.

**2028**

**PHARMACIST’S ROLE IN HEALTH INSURANCE BENEFIT DESIGN**

*Source: Council on Pharmacy Management*

To advocate that pharmacy practice leaders collaborate with internal and external partners who design, negotiate, and select their own organization’s health plans and pharmacy benefit management contracts to preserve patient continuity of care and the integrity of the health-system pharmacy enterprise; further,
To provide education and resources for all partners on the health plan development process, analysis of pharmacy benefit design, contemporary formulary review processes, and application of medication safety principles on formulary decision-making.

Rationale
Pharmacy leadership should be directly involved in the selection of the health system’s pharmacy benefit manager (PBM) servicing their employee’s health plan, and the terms of that contract with that PBM. Employers typically look to balance value for the employee while attempting to control costs. As health systems evaluate and select plans, there may not always be due consideration given to the potential impacts on patient continuity of care and on that health system’s pharmacy enterprise and financial solvency in servicing employees’ prescriptions through the selected PBM. Aside from the safety and continuity of care implications to the patient if the health system’s pharmacy is excluded from the employees’ network, organizations may unknowingly undermine utilization of their outpatient cancer and infusion programs. Three PBMs control the majority of the PBM market, exerting heavy influence in costs, pharmacy participation, formulary, and prior authorization criteria. By including pharmacy leadership to help make a well-informed decision about selecting a servicing PBM for a health system, and the contract terms associated with that PBM (i.e., clinical and financial aspects), some of these unintended consequences could be avoided.

2029
PRESERVING PATIENT ACCESS TO PHARMACY SERVICES BY MEDICALLY UNDERSERVED POPULATIONS
Source: Council on Pharmacy Management

To advocate for funding and innovative payment models to preserve patient access to acute and ambulatory care pharmacy services by rural or medically underserved populations; further,

To support the use of telehealth to maintain pharmacy operations and pharmacist-led comprehensive medication management that extend patient care services to and enhance continuity of care for rural or medically underserved populations; further,

To advocate that the advanced communication technologies required for telehealth be available to rural or medically underserved populations; further,

To advocate for funding of loan forgiveness or incentive programs that recruit pharmacists and pharmacy technicians to practice in rural or medically underserved populations.

Rationale
Medically Underserved Areas (MUAs) and Medically Underserved Populations (MUPs) are areas or populations designated by the Health Resources and Services Administration as having too few primary care providers, high infant mortality, high poverty, or a high elderly population. Whereas MUAs are a geographic designation, MUPs have a shortage of primary care health services for a specific population subset within an established geographic area. MUPs may face
economic, cultural, or linguistic barriers to healthcare; examples include low-income, Medicaid-eligible, homeless, migrant or seasonal worker, or Native American populations. Many federal programs use different types of shortage designations to determine eligibility. The Health Center Program and Physician J-1 Visa Waiver Program, for example, use both MUA and MUP, whereas the CMS Rural Health Clinic Program only uses MUA. Trends within the healthcare industry are also increasing the number of MUPs. Waning interest in primary care practice among medical graduates and the fiscal challenges of providing care in areas with declining populations or fewer insured patients contribute to this problem.

Increasing hospital closures are not a recent phenomenon – rural areas have been closing hospitals for decades. For instance, 140 rural hospitals closed between 1985 and 1988 after the implementation of Medicare’s Inpatient Prospective Payment System. This payment model led to large Medicare losses and increased financial distress for many rural hospitals, ultimately resulting in numerous hospital closings.

Today, many rural hospitals are facing a similar fate. Nationally, 430 rural hospitals are at high financial risk due to low reimbursement rates and decreasing local populations. These factors make it difficult for hospitals to cover fixed costs, let alone remain up to date with technological advances and emerging healthcare practices.

Since 2010, 99 hospitals in rural areas and MUAs in the U.S. have closed. Between 2013 and 2017 alone, 64 rural hospitals closed, which is more than twice as many as the previous 5-year period. Hospital closures disproportionality affected rural hospitals in the South (64% of rural hospital closures) and are more prevalent in states that did not expand Medicaid coverage. It is estimated that hundreds more hospitals are at risk of closing; therefore, the impact of these closures on access to and continuity of care should be assessed.

Although hospital closures in rural areas have numerous consequences, reduced access to care for the populations served is the most obvious one. An analysis by the Medicare Payment Advisory Commission determined that one third of hospitals that have closed since 2013 are more than 20 miles from the next closest hospital. An issue brief published by The Kaiser Commission on Medicaid and the Uninsured found a major impact of hospital closure to be loss of access to emergency care in the community; more specifically, a lack of access for people with acute mental health or addiction treatment needs was found.

Other consequences of rural hospital closures are focused around accessibility of physicians and other healthcare providers. Regardless of hospital closures, rural communities commonly struggle to recruit and retain healthcare providers. Retention of these providers becomes increasingly difficult when a hospital closes due to providers relocating to an alternative hospital or clinic location. As a result, communities are often left without vital healthcare providers and exacerbated gaps in access to specialty care. For instance, specialists who visited the local hospital on a regular basis become unavailable to residents in the area after the hospital closes, or residents lose their access point for referrals to subspecialists. In addition, once hospitals close other resources dwindle, such as home health, pharmacy, hospice, and emergency medical services care, thus leading to hospital deserts and a dramatic decrease in access to and continuity of care for residents.

With the number of hospital deserts increasing, residents are forced to seek care elsewhere, if at all. In a 2018 Government Accountability Office report, elderly and low-income
populations were more likely to be negatively impacted by rural hospital closures, and these populations were also found to be more likely to delay or forgo care after a hospital closure if the patient had to travel longer distances.

It is important to note that not all rural hospital closures lead to a complete depletion in access to care for residents. There has been some success with transitions to community-based primary care following a hospital closure. In this scenario local residents still have access to primary care services, but not necessarily critical services, such as those necessary for cardiac arrest or stroke. Currently there is no systematic approach to determine which services are critical to provide locally or virtually, and not every hospital closing can be smoothly transitioned into a primary care facility to address residents’ healthcare needs.

2030
INTERSTATE PHARMACIST LICENSURE
Source: Council on Pharmacy Management
To advocate for interstate pharmacist licensure to expand the mobility of pharmacists and their ability to practice.

Rationale
Rapid changes in technology have increasingly allowed healthcare to be delivered at a distance, and the growth of health systems and the consolidation and closing of hospitals in rural areas have created a demand for practitioner mobility across state lines. The century-old state-by-state licensure model of pharmacy has not kept pace with these changes, creating barriers to care. The nursing profession has addressed this challenge by creating the enhanced Nurse Licensure Compact (NLC). Under the NLC, registered nurses and licensed practical/vocational nurses who meet uniform standards are granted one multistate license that provides the privilege to practice in their home state and any other NLC state. This licensing model protects the interests of the state in ensuring the qualifications of its healthcare providers while fostering provider mobility and distance healthcare, increasing access to care. This licensing model has demonstrated its value by growing to include 25 states over 20 years. In addition, the NLC reduces the cost and administrative burden of licensure to both healthcare organizations and providers.

2031
CONTINUITY OF CARE IN INSURANCE PAYER NETWORKS
Source: Council on Pharmacy Management
To oppose provider access criteria that impose discriminatory requirements or qualifications on participation in insurance payer networks that interfere with patient continuity of care or patient site-of-care options.

Rationale
As hospitals and healthcare organizations have become more engaged in developing ambulatory care services, pharmacies (e.g., specialty, outpatient infusion) and pharmacists working in those settings increasingly find themselves excluded from healthcare payer
networks. ASHP acknowledges that healthcare payers may develop and use criteria to determine provider access to its networks to ensure the quality of services and the financial viability of providers (i.e., ensuring sufficient patient volume to profitably operate), but when creating provider networks, payers should also consider the potential impacts on a patient’s care and choice. Patients generally choose pharmacies that are most convenient for them. When providers or pharmacies are locked out of a payer network, patients may face barriers (e.g., physical access) to therapy, which can delay or otherwise frustrate treatment. Pharmacies within health systems have an advantage when it comes to electronic health record (EHR) integration, proximity and relationship to providers, and in some cases onsite clinical pharmacy specialists. This clinically superior environment, coupled with health systems’ ability to measure and meet outcome-based metrics, allows them to easily show their performance against other pharmacies. Therefore, giving payer network access to integrated health-system pharmacies could improve care coordination and quality-based care, and reduce overall cost.

2032

HEALTH-SYSTEM USE OF MEDICATIONS SUPPLIED TO HOSPITALS BY PATIENTS, CAREGIVERS, OR SPECIALTY PHARMACIES

Source: Council on Pharmacy Management

To support care models in which medications are prepared for patient administration by the pharmacy and are obtained from a licensed, verified source; further,

To encourage hospitals and health systems not to permit administration of medications supplied to the hospital or clinic by the patient, caregiver, or specialty pharmacy when storage conditions or the source cannot be verified, unless it is determined that the risk of not using such a medication exceeds the risk of using it; further,

To advocate adequate reimbursement for preparation, order review, and other costs associated with the safe provision and administration of medications.

This policy supersedes ASHP policy 0806.

Rationale

Medications supplied to a hospital or health system without an institution’s direct oversight raise questions about a product’s proper storage and pedigree. These include patient home medications, including specialty pharmaceuticals (i.e., brown-bagging) brought in by the patient or caregiver, and specialty pharmaceuticals shipped directly from a specialty pharmacy directly to the location where they are being administered (i.e., white-bagging). The hospital or health system should have policies and procedures in place and make a reasonable attempt to verify the medication pedigree and product integrity to ensure safe and appropriate administration of medications. Health and pharmacy benefit management models should ensure fair reimbursement and payment for medication preparation and administration and in the provision of direct patient care services for medications supplied to patients from a supplier outside of a hospital or health system.
2033  
HEALTH-SYSTEM USE OF ADMINISTRATION DEVICES SUPPLIED DIRECTLY TO PATIENTS  
Source: Council on Pharmacy Management  
To recommend that hospitals and health systems have a system in place for determining the risk versus benefit of permitting a patient to use his or her own medication administration devices; further,  

To advocate that hospitals and health systems have policies and procedures, including the training of staff, on the use and management of medication administration devices and devices that augment medication administration (e.g., continuous glucose monitors); further,  

To advocate that hospitals and health systems ensure that pharmacists participate in the identification of medication administration devices brought in by patients and communicate those findings to the interprofessional care team; further,  

To advocate for adequate reimbursement for preparation, order review, and other costs associated with the safe provision and administration of medications and use of related devices.  

This policy supersedes ASHP policy 0806.  

Rationale  
The potential exists for serious patient safety and liability issues for healthcare staff when the use of patients’ own infusion devices is allowed. Devices unfamiliar to staff are particularly risky and may result in patient harm. There are, however, occasions when the benefits of using patients’ own devices may outweigh the risks. Organizational policies and procedures should exist for handling such situations, complemented by expedient methods to gain familiarity and competency demonstration with a device. A pharmacist should be available to verify the medication and the associated device and use a technique (e.g., Situation, Background, Assessment and Recommendation [SBAR], team huddle) for communicating critical information to the interprofessional care team.  

2034  
STAFFING FOR SAFE AND EFFECTIVE PATIENT CARE  
Source: Council on Pharmacy Management  
To encourage pharmacy leaders to work in collaboration with physicians, nurses, health-system administrators, and others to outline key pharmacist services that are essential to safe and effective patient care and employee engagement; further,  

To encourage pharmacy leaders to be innovative in their approach and to factor into their thinking the potential benefits and risks of flexible staffing models, telehealth practices, legal
requirements, accreditation standards, professional standards of practice, and the resources and technology available in individual settings.

This policy supersedes ASHP policy 0201.

Rationale
The advancement of the pharmacy profession over the past decade has prepared and positioned pharmacists to care for complex patients and adapt to the dynamic and rapidly progressive field of medicine. Throughout the years, an increased involvement of pharmacists in specialty areas such as transplant, critical care, oncology, and pain and palliative care has been observed. Therefore, it is imperative that such advancement is considered when developing staffing models, in order to ensure the pharmacy workforce is appropriately allocated for the provision of consistent, safe, and high-quality patient care.

The complexity of patient care will continue to increase, and with that, so will the expected responsibilities, opportunities, and skills of the pharmacy workforce. Consequently, pharmacists engaged in direct patient care are encouraged to pursue and maintain their training and credentialing in order to continue to enhance their competency, skills, and participation in innovative practice. The expansion and dynamic nature of the pharmacy profession requires new approaches to explore flexible staffing models to avoid a stagnant practice, encourage continual advancement, and accommodate the evolving priorities of the pharmacy workforce.

The development and implementation of flexible staffing models can enable pharmacists to engage in further professional development and career advancement (e.g., training in areas of specialization, degree programs) and enjoy a more stable work-life integration experience. Recently, more attention has been drawn to burnout, resilience, and job satisfaction among the pharmacy workforce. Research has shown that pharmacists are reporting increased job stress over the previous years and that approximately 53% of pharmacists are reporting a high degree of burnout, which can consequently threaten patient safety. Therefore, there is an imperative to develop staffing models to meet staff members’ changing priorities and provide additional flexibility in the workplace. Implementation of flexible staffing models could improve performance and promote employee engagement in the workplace. Pharmacy leaders should be committed to maintaining high-quality and consistent patient care services and to also promote models that balance patient care with staff priorities.

Various options to consider when exploring flexible staffing models include telehealth practices, remote order review and verification (i.e., telecommuting), and productivity measures to ensure patient census is well distributed among pharmacists in charge of providing clinical services. Another concept related to flexible staffing models is leveraging pharmacy technicians’ roles to support pharmacist engagement in direct patient care activities. Some institutions have explored data-driven, staffing-to-demand models based on real-time patient-volume metrics. The concept is to allocate staff to tasks based on the current workload, which is evaluated daily. Other institutions are also utilizing metrics such as number of doses dispensed at a certain point in time and volume of order verification throughout the day in order to divide patient care units evenly among pharmacists that perform order verification or
provide clinical services. Flexible staffing models should support the following principles:

- Sufficient qualified staff must exist to ensure safe and effective patient care.
- During periods of staff shortages, pharmacists must exert leadership in directing resources to services that are the most essential to safe and effective patient care.
- Within their own organizations, pharmacists should develop contingency plans to be implemented in the event of insufficient staff—actions that will preserve services that are the most essential to safe and effective patient care and will, as necessary, curtail other services.
- Among the essential services for safe and effective patient care is pharmacist review of new medication orders before the administration of first doses; in settings where patient acuity requires that reviews of new medication orders be conducted at any hour and similar medication-use decisions be made at any hour, there must be 24-hour access to a pharmacist.

Other healthcare disciplines (e.g., nursing) have historically utilized flexible staffing models to optimize services, reduce the risk of adverse events, and improve patient outcomes. The different models explored by nursing include patient ratio, patient acuity, collaborative staffing, and supplemental staffing model. There is limited literature on the use of flexible staffing models, but the concept is being explored by various health-system pharmacy departments.

2035
ROLE OF THE PHARMACY WORKFORCE IN VIOLENCE PREVENTION

*Source: Council on Pharmacy Practice*

To recognize that violence in the U.S. is a public health crisis; further,

To affirm that the pharmacy workforce has important roles in a comprehensive public health and medical approach to violence prevention, including leadership roles in their communities and workplaces; further,

To encourage members of the pharmacy workforce to seek out opportunities to engage in violence prevention efforts in their communities and workplaces; further,

To promote collaboration between the pharmacy workforce and community and healthcare organizations in violence prevention efforts; further,

To foster education, training, and the development of resources to prepare the pharmacy workforce for their roles in violence prevention; further,

To support research and dissemination of information on the effectiveness of pharmacy-focused violence-prevention strategies.

*Rationale*

The World Health Organization defines violence as “the intentional use of physical force or
power, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment or deprivation.” The Centers for Disease Control and Prevention (CDC) reports that in the U.S. 7 people die a violent death each hour -- 47,000 from suicide and 19,500 from homicide annually -- and a 2015 report found more than 2.5 million violence-related injuries annually. The CDC estimates that violence costs the U.S. $9 billion annually in medical costs and lost work, and a separate estimate places the cost of violence as a whole to U.S. hospitals and health systems at $2.7 billion dollars in 2016. The staggering human loss and soaring costs have led numerous organizations of healthcare and public health professionals to label violence a public health crisis and take action to address violence as a public health problem. One prominent example is the American Hospital Association Hospitals Against Violence Initiative, which provides examples and best practices to address its three central topics: workforce and workplace violence, combating human trafficking, and preventing youth violence.

ASHP believes that members of the pharmacy workforce have “a responsibility to participate in global, national, state, regional, and institutional efforts to promote public health” and that the pharmacy workforce has important roles in primary, secondary, and tertiary interventions to prevent violence. The CDC National Center for Injury Prevention and Control, Division of Violence Prevention states that the different forms of violence they identify—child abuse and neglect, youth violence, intimate partner violence, sexual violence, elder abuse, and suicidal behavior—are strongly connected and share common risk and protective factors. Interventions the pharmacy workforce could be involved in include but are not limited to

- improving access to mental health services, including treatment for substance use disorder;
- screening to identify victims of or individuals at risk of violence;
- providing trauma informed care;
- providing lethal means counseling;
- supporting hotlines and community support systems for people in crisis;
- providing or promoting Stop-the-Bleed bystander training; and
- participating in or promoting community- or hospital-based violence prevention organizations.

To fill these important roles, members of the pharmacy workforce will need appropriate education, training, and resources. Although some education, training, and resources are appropriate for different healthcare providers, ASHP is committed to the development of resources to prepare the pharmacy workforce for pharmacy-specific roles in violence prevention and to supporting research and dissemination of information on the effectiveness pharmacy-focused violence-prevention strategies. In addition, institutional and community leaders need to be aware of the pharmacy workforce’s commitment to preventing violence. ASHP is committed to raising awareness with other stakeholders of the profession’s commitment to collaborate to end the cycle of violence in their institutions and communities.

2036
RACIAL AND DISCRIMINATORY INEQUITIES

Click policy number or title to view policy.
*Rationale follows policy language.
Source: House of Delegates

To acknowledge that racism, discrimination, and inequities exist in healthcare and society; further,

To assert that racism, or any form of discrimination or injustice, has no value in society and cannot be tolerated; further,

To fervently commit to creating a just and inclusive healthcare system and society.

Rationale
ASHP and its members have long been committed to eliminating racial and ethnic disparities in healthcare and recognize the need to further strengthen that commitment following the recent killings of George Floyd, Ahmaud Arbery, and Breonna Taylor. ASHP has pledged to take actionable steps through the creation of a Board of Directors-appointed Task Force on Racial Diversity, Equity, and Inclusion. The Task Force is charged with taking inventory of ASHP’s efforts in the areas of racial diversity, equity, and inclusion as they relate to issues facing Black Americans, and for making related recommendations on new or enhanced efforts ASHP may undertake. ASHP further seeks to help eliminate racism, discrimination, and inequities that impact other minority and underrepresented populations and to help improve diversity, equity, and inclusion in healthcare and society.

2037
SUPPORT OF THE WORLD HEALTH ORGANIZATION
Source: House of Delegates

To strongly support the mission and work of the World Health Organization in its role in public health preparedness, prevention, and control to improve the health and well-being of people globally.

Rationale
In an age of global travel between and among countries, the efforts to prevent, control, treat, and eradicate diseases and conditions that decrease health and well-being of all peoples are critical to all countries, independent of factors such as income and education. Addressing new vectors of disease transmission and behavioral conditions related to lifestyles and environmental conditions continue to provide challenges that need to be addressed. Agencies such as World Health Organization that provide evidence-based warnings, guidelines, education, research, and advocacy, and that collect data to help countries prepare their public health infrastructure, are critical in providing all peoples with the tools and resources needed to address critical health issues globally.

2038
ASHP STATEMENT ON THE USE OF ARTIFICIAL INTELLIGENCE IN PHARMACY
Source: Section of Pharmacy Informatics and Technology

To approve the ASHP Statement on the Use of Artificial Intelligence in Pharmacy.
1901
SUICIDE AWARENESS AND PREVENTION


To support the goal of zero suicides; further,

To collaborate with key stakeholders in support of suicide awareness and prevention; further,

To acknowledge that optimal suicide awareness and prevention efforts focus both on patients and on the healthcare workforce; further,

To recognize that pharmacists, as key providers on the patient care team, are integral to suicide awareness and prevention efforts, and to acknowledge the vital role of other members of the pharmacy workforce in those efforts; further,

To foster the use and development of clinically validated tools to aid the pharmacy workforce in assessing the influence of medications and other factors on suicidality; further,

To provide education that assists the pharmacy workforce in their continuing professional development efforts related to suicide awareness and prevention; further,

To support the inclusion of suicide awareness and prevention principles throughout pharmacy curricula and postgraduate educational and training programs; further,

To encourage efforts that support universal education and training of healthcare providers in suicide awareness and prevention; further,

To advocate for adequate government and healthcare organization funding for suicide awareness and prevention; further,

To enhance awareness of local, state, and national suicide awareness and prevention resources, including the National Suicide Prevention Lifeline funded by the Substance Abuse and Mental Health Services Administration; further,

To foster education and research on suicide awareness and prevention.

*Rationale*

The high and increasing number of suicides in the U.S. has created a call for national action. The U.S. Surgeon General and the National Action Alliance for Suicide Prevention, in the 2012 National Strategy for Suicide Prevention, provided general guidance for various societal
approaches, including public awareness and development of effective clinical practices targeting suicide prevention. The National Strategy set an aspirational zero suicides goal for healthcare services, which will require a systemwide effort to improve healthcare’s approach to suicide prevention, including clinician training and implementation of better referral systems.

The responsibility for healthcare professionals to become involved in suicide prevention extends beyond those specializing in mental health services, as suicide may be viewed as a response to multiple biological, psychological, interpersonal, environmental, and societal influences that interact with one another and may change over time. Suicide prevention, when viewed as the collective efforts of government, public and private organizations, and care providers to reduce the incidence of suicide, requires a correspondingly broad response by healthcare professionals. In 2016, the Joint Commission published a Sentinel Event Alert urging healthcare organizations to develop policies, staff education, and comprehensive care plans to utilize suicide risk assessment tools and support patients with suicide risk factors. The Joint Commission urged all healthcare organizations to develop clinical environment readiness by identifying, developing, and integrating comprehensive behavioral health, primary care, and community resources to assure continuity of care for individuals at risk for suicide.

In addition, concern over drug-associated suicidal ideation and behavior has been increasing over the last decade. In 2012, the Food and Drug Administration (FDA) issued draft guidance on assessing the occurrence of suicidal ideation and behavior in clinical drug trials. Over 800 drugs have been linked to an increased risk of suicidal thoughts and depression, from central nervous system agents to antimicrobials. The ASHP Medications and Suicidality Web Resource Center contains guidelines and publications concerning drug-associated suicidality and maintains links to information on individual drugs associated with depression and suicidality. ASHP encourages continued research on suicidal ideation and behavior in clinical trials and supports safety measures by manufacturers and FDA (e.g., risk evaluation and mitigation strategies, boxed warnings) when appropriate.

Given the leading role of pharmacists in overseeing safe medication use, the dangers of medications relating to suicide risk, and the high degree of pharmacist interaction with patients, pharmacists are well positioned to play a key role in suicide awareness and prevention efforts. The pharmacist’s role could include, for example, ensuring appropriate use of medications in management of mental health and other medical conditions; identifying patients at risk for suicide, and evaluating that suicide risk; and recommending care, making referrals, and following up on referrals with patients and providers. Strategies could range from evaluating patients’ prescribed medications and identifying those that increase risk for suicidality; to counseling patients, caregivers, and other healthcare providers about those risks; to educating the public about the dangers of unused medications and the need for proper disposal. Clinical pharmacy specialists trained in behavioral health could also be incorporated into behavioral health programs to serve as a resource to the healthcare team. Other pharmacy practitioners (student pharmacists and pharmacy technicians) could perform vital services in suicide awareness and prevention efforts as well, such as medication reviews. The goal of zero suicides will also require a combined effort from individual healthcare workers and the healthcare system as a whole to sustain clinician well-being and resilience, as further described in ASHP policy 1825, Clinician Well-Being and Resilience.
To ensure that pharmacy practitioners have the competence and confidence to properly fill these key roles, ASHP is committed to providing education and tools to assist pharmacy practitioners in suicide awareness and prevention efforts. Further, ASHP advocates inclusion of suicide awareness and prevention in college of pharmacy curricula and postgraduate educational and training programs, through a multimodal approach. ASHP also advocates universal suicide awareness and prevention training for healthcare providers, including pharmacists, via mandatory state education requirements and other means. Adequate government and private-sector funding of suicide awareness and prevention efforts will be required to promote the success of suicide awareness and prevention efforts. ASHP joins other organizations in supporting efforts to promote awareness of local, state, and national suicide awareness and prevention resources, including the National Suicide Prevention Lifeline (1-800-273-TALK [8255]), with the ultimate goal of making the Lifeline number as memorable as the 911 emergency hotline. The Lifeline, accessible via phone and chat (https://suicidepreventionlifeline.org/), is a national network of 150 local crisis centers that provides free and confidential emotional support to people in suicidal crisis or emotional distress 24 hours a day, 7 days a week. Finally, ASHP urges research on suicide awareness and prevention, including research on patient assessment tools, the role of genomic testing in drug approval and patient care, and practice models and strategies to identify and manage patients at risk for suicide.

1902

SAFE ADMINISTRATION OF HAZARDOUS DRUGS

Source: Council on Pharmacy Practice

To advocate that all healthcare settings proactively conduct an interprofessional assessment of risk for exposure to hazardous drugs (HDs) during administration, including when closed-system transfer devices (CSTDs) cannot be used; further,

To advocate for pharmacist involvement in the development of policies, procedures, and operational assessments regarding administration of HDs, including when CSTDs cannot be used; further,

To encourage device and pharmaceutical manufacturers and the Food and Drug Administration to foster development of CSTD-compatible, ready-to-administer HD products.

Rationale

Hazardous drugs (HDs) present well-known risks to healthcare workers who handle them. Most HDs are administered orally or intravenously; however, other routes of administration are sometimes used, such as intrathecal, intraventricular, or intravesicular administration, or perfusion into a vessel or organ cavity. These procedures are becoming more common. Healthcare providers are required to use personal protective equipment and other protective devices, such as closed-system transfer devices (CSTDs), when the dosage form allows. The protective precautions required for administration through these routes is well described in United States Pharmacopeia (USP) General Chapter 800, the ASHP Guidelines on Handling.
Hazardous Drugs, the Oncology Nursing Society’s Safe Handling of Hazardous Drugs, and other sources.

HDs are sometimes administered through other routes (e.g., Ommaya reservoirs, intraperitoneal infusion) for which protective precautions are not as well described or CSTD use is not possible. ASHP encourages all healthcare settings to conduct an interprofessional, proactive assessment of the risk of such procedures to assess the potential exposure risks for healthcare providers and identify mitigating measures. Given their depth of knowledge regarding the handling of HDs, pharmacists should be involved in the development of policies, procedures, and operational assessments regarding administration of HDs in such circumstances. To reduce the risks to healthcare providers, ASHP encourages device and pharmaceutical manufacturers and the Food and Drug Administration to foster the development of CSTD-compatible, ready-to-administer HD drug products. The goal would be that CSTDs be utilized for all routes of administration of HD products as a best practice. However, when such use is not possible, an assessment of risk could identify gaps and ensure there are pharmacy-guided policies to address the handling, compounding, and administration for all healthcare staff coming into contact with HDs during administration via nontraditional routes. Such policies could also address any specialized training for staff in procedural areas, or the availability of a HD-specialized trained staff member to assist in the administration of the drug (e.g., a “chemo nurse”).

1903

COMPOUNDED STERILE PREPARATION VERIFICATION

Source: Council on Pharmacy Practice

To advocate that health systems adopt automation and information technology to facilitate in-process and final verification of compounded sterile preparations (CSPs) to ensure CSP quality; further,

To advocate that, until such time as automation or technology can be implemented, independent in-process and final verification of CSPs be performed; further,

To oppose the use of the syringe pull-back method or other proxy methods of CSP verification.

This policy supersedes ASHP policy 1617.

Rationale

Adoption of automation and information technology for preparing and dispensing compounded sterile preparations (CSPs) is increasing but not evenly distributed among healthcare organizations. A 2017 ASHP survey showed that 64% of hospitals did not use any technology for sterile product preparation activities. Only 26.9% of health systems surveyed employed barcode verification in their IV medication preparation and verification process. The survey found that 12.8% of all health systems surveyed used drug workflow software to manage IV drug preparation, verification, and dispensing. There are many reasons for these disparate rates
of adoption. Each institution has a different break-even point of investment versus return, and challenges of implementation can be daunting. Some organizations have implemented automated compounding technology only to withdraw it later. These technologies may slow the preparation and verification process; however, the enhanced safety outweighs losses in operational efficiency.

Information technology and automation, including robotics, can be used to improve the safety of CSP compounding. Although IV workflow technologies continue to be developed and improved, the majority of pharmacy departments continue to compound manually without the assistance of barcode or other technologies. Health systems have been slow to adopt IV workflow technology, with only 27% of respondents to the 2017 survey indicating their departments use barcode scanning to verify the ingredients in CSPs. If automated procedures are not employed, there are only two methods of in-process or final verification: real-time, direct, and independent visualization, or retroactive, proxy verification (e.g., the syringe pull-back method). The dangers of the syringe pull-back method have been well demonstrated, and the 2016 Institute for Safe Medication Practices (ISMP) Guidelines for Safe Preparation of Compounded Sterile Preparations discourage its use.

1904
NOTIFICATION OF DRUG PRODUCT PRICE INCREASES
Source: Council on Public Policy

To advocate for manufacturers to provide notice and justification to the public and healthcare providers in advance of drug price increases; further,

To advocate for transparency in drug product pricing decisions.

Rationale
Many factors contribute to high drug product costs, and addressing the problem is made difficult by lack of knowledge about the marketplace for those products. For example, rebates negotiated by pharmacy benefit managers (PBMs) and discounts to other buyers make it difficult to determine the actual price of a drug product. ASHP advocates for more publicly accessible information on drug product pricing, such as an annual report on increases in drug product prices. Such information would provide patients and their healthcare providers with the information needed to make drug product purchasing choices. The purpose of this policy is to advocate for laws and regulations that would require drug product manufacturers to publicly report price increases in advance and provide justification for those increases, as well as to advocate for transparency regarding drug product pricing decisions. The policy is intended to increase public knowledge concerning pricing decisions made by different parties in the drug product supply chain (e.g., manufacturers, distributors, PBMs, group purchasing organizations) who may influence drug product prices.

1905
MITIGATING DRUG PRODUCT SHORTAGES
Source: Council on Public Policy
To advocate for ongoing federal evaluation of how drug product shortages present risks to national security and public health; further,

To advocate that drug product manufacturers be required to disclose manufacturing sites and sources of active pharmaceutical ingredients (APIs) to facilitate such a risk assessment; further,

To recommend that the Food and Drug Administration (FDA) require drug product manufacturers to have contingency plans for maintaining drug supplies; further,

To advocate that drug product manufacturers be required to provide a specific reason for a shortage and an estimated timeline for resolution in their Food and Drug Administration Safety and Innovation Act notifications to FDA; further,

To advocate that FDA be required to publicly provide quality ratings for 503B outsourcing facilities preparing copies of drug products under the exemption for products on FDA's shortage list; further,

To advocate that the Federal Trade Commission be required to evaluate the potential for drug product supply chain interruptions when considering manufacturer consolidations.

**Rationale**
In November 2017, ASHP convened a meeting of healthcare professional organizations to review and identify new opportunities to address the ongoing supply chain and patient care challenges associated with drug product shortages. Participants at the meeting examined how the 2012 FDA Safety and Innovation Act (FDASIA) has impacted drug product shortages and made recommendations to prevent and mitigate future shortages. One of those recommendations was that the federal government undertake an evaluation of the risks drug product shortages could present to national security. Such an evaluation would need to consider the risks posed by sourcing of APIs and excipients, as well as by the location of manufacturing sites.

FDA’s Strategic Plan for Preventing and Mitigating Drug Shortages recommends that drug product purchasers consider quality in making purchasing decisions. Information that purchasers would find helpful in prospectively assessing drug product quality includes the production and compliance history of a manufacturer, the specific name and location of the manufacturing plant, and the source of raw materials. Because approximately 80 percent of APIs used in U.S. drug product manufacturing comes from foreign sources, FDA has limited ability to inspect and certify that those APIs are unadulterated. In addition, although FDA publishes some quality information about manufacturers, it is sometimes difficult to know who the actual manufacturer is and which specific plant location produced the product, because drug companies may rely on contract manufacturers to produce drug products through licensing agreements. Requiring manufacturers to disclose that information publicly would allow for improved evaluation of a manufacturer’s integrity and alignment with current good
manufacturing processes. Detailed knowledge of manufacturing sites would also allow the government and healthcare systems to plan for or avoid disruptions to the supply chain like those that followed Hurricanes Irma and Maria in 2017, when supplies of 40 critical pharmaceutical products went into shortage, in part because of disruption to the large number of pharmaceutical manufacturing facilities in Puerto Rico. Lack of information about such disruptions can also lead to hoarding, which exacerbates an existing shortage. To avoid similar disruptions, FDA should require manufacturers to have contingency plans for maintaining drug product supplies during events that could disrupt production, such as natural and manmade disasters (e.g., hurricanes, cyber-attacks, electricity failures, shipping disruptions).

FDASIA requires that drug product manufacturers submit a notification of a production disruption to FDA. Manufacturers should also be required to provide in these notices a specific reason for the shortage and an estimated timeline for resolution. This information would be helpful not only to those affected but also in the federal evaluation of the risks posed by drug product shortages. Healthcare providers addressing drug product shortages also need information to evaluate the quality of copies of drug products produced by 503B outsourcing facilities under the exemption for products on FDA’s shortage list. Congress should require FDA to publicly provide quality ratings for those manufacturers.

Finally, to avoid future drug product shortages, the Federal Trade Commission should be required to evaluate the potential for drug product supply chain interruptions when considering manufacturer consolidations.

1906
EMERGENCY SUPPLIES OF DRUG PRODUCTS
Source: Council on Public Policy

To advocate for states to allow any pharmacist, during a declared emergency, to dispense without a prescription an emergency supply of a drug product in quantities that meet the needs of patients.

Rationale
Many states allow pharmacists to provide emergency supplies of prescription drug products during or in the immediate aftermath of a declared emergency. States such as Florida allow this practice for up to 72 hours after an emergency has been declared (i.e., a patient can obtain a 72-hour supply during an emergency or disaster). However, the long duration of events like hurricanes demonstrates the need to expand the 72-hour window. Hurricanes, for example, typically generate an emergency declaration prior to the storm, and the impact can last until days after the storm, when flood waters crest. Several states, including California and Texas, allow pharmacists to adequately provide prescription drug products, excluding controlled substances, during disasters, emergencies, or catastrophic events. In California, pharmacists are empowered to use their professional judgment when determining the appropriate quantity of an emergency fill. In these situations, patients without a prescription may use an empty pill bottle or other documentation to demonstrate their need for a drug product. In addition, states sometimes require appropriate follow-up by the pharmacist with the patient’s prescriber and supporting documentation of the provision of care under an emergency declaration. American
Medical Association policy H-120.933, Emergency Prescription Drug Refills, calls for emergency refills beyond the 72-hour period, excluding controlled substances.

1907
CREDENTIALING AND PRIVILEGING BY REGULATORS, PAYERS, AND PROVIDERS FOR COLLABORATIVE PRACTICE

Source: Council on Public Policy

To advocate expansion of collaborative practice agreements in which the prescriber and pharmacist agree upon the conditions under which the pharmacist initiates, monitors, and adjusts a patient’s drug and non-drug therapy; further,

To support (1) the development (as a professional initiative by pharmacist associations rather than as a government activity) of national standards for determining a pharmacist’s competence to provide medication management services and (2) the appropriate use of these standards by clinical privileging systems, government authorities, and public or third-party payers; further,

To advocate pharmacists be included as providers in medical staff bylaws; further,

To support the use of credentialing and/or clinical privileging by hospitals, health systems, and payers in a manner that is consistent with other healthcare professionals to assess a pharmacist’s competence to engage in medication management services within the hospital or health system.

*This policy supersedes ASHP policy 0905.*

Rationale

Nearly all states permit some form of collaborative practice. ASHP not only supports collaborative practice but advocates its expansion. To help achieve the goal of recognizing and paying pharmacists for medication management services (a step toward universal recognition of pharmacists as healthcare providers), ASHP recognizes that public and private payers may require pharmacists to demonstrate competence to provide medication management services and that state licensure may not be the only state-imposed legal requirement to provide those services.

ASHP supports a professional initiative to develop national standards for determining pharmacist competence and the appropriate use of these standards by clinical privileging systems, governments, and public or third-party payers. ASHP continues to support the application of credentialing and/or clinical privileging processes to medication management services as practiced within hospitals and health systems and by payers, consistent with other healthcare professionals (e.g., by including pharmacists as providers in medical staff bylaws).

1908
340B DRUG PRICING PROGRAM SUSTAINABILITY

Click policy number or title to view policy.
*Rationale follows policy language.*
Source: Council on Public Policy

To affirm the intent of the federal drug pricing program (the “340B program”) to stretch scarce federal resources as far as possible, reaching more eligible patients and providing more comprehensive services; further,

To advocate for continued access to the 340B program in accordance with the intent of the program; further,

To advocate that reimbursement and contracting policies promote 340B program stability and to oppose reimbursement and savings reductions to covered entities; further,

To advocate for clarification and simplification of the 340B program and any future federal discount drug pricing programs with respect to program definitions, eligibility, and compliance measures to ensure the integrity of the program; further,

To encourage 340B participants to provide appropriate stewardship of the 340B program; further,

To educate pharmacy leaders and health-system administrators about the internal partnerships and accountabilities and the patient-care benefits of program participation; further,

To educate health-system administrators, risk managers, and pharmacists about the resources required to support 340B program compliance and documentation; further,

To encourage communication and education concerning the value of the 340B program; further,

To advocate that the Health Resources & Services Administration Office of Pharmacy Affairs have sufficient regulatory authority to enforce compliance for all stakeholders with the 340B program.

This policy supersedes ASHP policy 1817.

Rationale

Statutory and other policy changes to the federal drug pricing (“340B”) program over the years have spurred an increase in the number of hospitals and other eligible entities that participate. Since the program’s inception, the number of 340B-eligible and participating hospitals has continued to grow. In response, policymakers and other stakeholders have raised questions over how the discounts are used by covered entities and what value the program brings to their respective communities. Congress has held hearings, and bills have been introduced to reform the program. Among the items Congress is considering are transparency, increasing authority of the Health Resources & Services Administration (HRSA) to oversee the program,
reimbursement cuts imposed under Medicare Part B on 340B drugs, and examining policy that passes the discount along to the patient.

Expansion of Medicaid eligibility in 2014 (through provisions in the Affordable Care Act) allowed additional hospitals to participate in the program, further driving scrutiny and questions from policymakers and stakeholders. In response to policymaker and stakeholder concerns, ASHP recognizes the important intent and role of the 340B program and stresses the need for its continued sustainability. These developments demonstrate the need for pharmacy leaders to engage in a strategic response to this compliance environment.

The original intent of the 340B program was to “to enable these entities to stretch scarce federal resources as far as possible, reaching more eligible patients and providing more comprehensive services.” (H.R. Rept. 102-384, pt. 2, at 12 [1992]). ASHP emphasizes the need for clarification and simplification (to the extent possible) of the program in order to enable compliance and maintain program integrity. Further, there is a need for communication and collaboration with public and private payers to ensure optimization of benefits from the 340B program and related contract and reimbursement policies.

1909
PHARMACIST AUTHORITY TO PROVIDE MEDICATION-ASSISTED TREATMENT
Source: Council on Public Policy

To advocate for the role of the pharmacist in medication-assisted treatment (MAT) for opioid use disorder, including patient assessment, education, prescribing, and monitoring of pharmacologic therapies; further,

To pursue the development of federal and state laws and regulations that recognize pharmacists as providers of MAT for opioid use disorder; further,

To foster additional research on clinical outcomes of pharmacist-driven MAT; further,

To advocate for the removal of barriers for all providers to be able to provide MAT to patients.

Rationale
An estimated 2.5 million Americans suffer from opioid use disorder. In 2017, the President’s Commission on Combating Drug Addiction and the Opioid Crisis recommended that the U.S. increase screenings and treatment for opioid use disorder. Many pharmacists have the skills to provide direct care to patients with opioid addiction or assist other healthcare providers in caring for these patients. Although some states allow pharmacists to prescribe controlled substances under collaborative practice agreements, pharmacists are not eligible to obtain a waiver under the Drug Addiction Treatment Act of 2000 to prescribe buprenorphine or other drugs for opioid use disorder. Having such prescribing authority would allow pharmacists to fully exercise their expertise and expand the pool of MAT providers. ASHP advocates the removal of barriers for all providers to be able to provide MAT to patients and encourages additional research on the clinical outcomes of pharmacist-driven MAT.
1910
THERAPEUTIC USE OF CANNABIDIOL
Source: Council on Therapeutics

To support continued research and to provide education on the therapeutic uses, adverse effects, and drug interactions of cannabidiol (CBD); further,

To oppose use of CBD-containing products not regulated by the Food and Drug Administration; further,

To advocate for enhanced public education regarding safe use of CBD-containing products.

Rationale
In June 2018, the Food and Drug Administration (FDA) approved Epidiolex, an oral solution containing cannabidiol (CBD), for the treatment of seizures associated with Lennox-Gastaut syndrome and Dravet syndrome, in patients two years of age and older. Epidiolex is the first prescription formulation of highly purified component of the Cannabis sativa plant. Because it does not contain a significant amount of tetrahydrocannabinol, the intoxicating substance in Cannabis sativa, in September 2018 the Drug Enforcement Administration placed Epidiolex in schedule V of the Controlled Substances Act (CSA), the least restrictive schedule of the Act.

Given the patchwork of state legislation regarding recreational and medical cannabis, there is a robust but largely unregulated industry in cannabis derivatives, including products promoted as containing CBD. These formulations range from lotions for topical application to oils for enteral consumption, and their components and CBD concentrations vary, leading to questions about their safety. FDA has issued over 40 warning letters to firms marketing products that allegedly contain CBD. As part of these actions, FDA has tested the chemical content of cannabinoid compounds in some of the products, finding that many do not contain the levels of CBD claimed.

With CBD’s easy availability came spurious claims regarding its efficacy in treating a number of maladies. Faced with the unique challenge of regulating an approved drug and widely available formulations of a similar product, FDA is currently considering a two-pronged approach that would:

1) regulate products that make therapeutic claims as new drugs, evaluating them for both safety and efficacy (e.g., Epidiolex); and

2) allow the continued marketing of CBD-containing products that do not make therapeutic claims, with limited regulation for safety (e.g., as dietary supplements).

ASHP opposes use of CBD-containing products not regulated by FDA in research and patient care. Further, due to concerns that patients may substitute unapproved cannabis-derivative products for the FDA-approved drug or confuse the two, ASHP advocates for enhanced patient and public education regarding safe use of CBD-containing products, and encourages pharmacists take a leadership role in those efforts. ASHP encourages research on the potential therapeutic uses, adverse effects, and drug interactions of CBD, and is committed to providing education to pharmacists and other healthcare providers on those topics.
1911
PHARMACY EXPERTISE IN STERILE COMPOUNDING
Source: Council on Education and Workforce Development
To support colleges of pharmacy in providing sterile compounding and aseptic technique instruction in didactic and experiential curricula that reflect the needs of the workforce; further,

To promote the use of sterile compounding training programs to foster an increase in the number of pharmacists and pharmacy technicians with sterile compounding expertise; further,

To advocate that pharmacists and pharmacy technicians who work in sterile compounding attain compounded sterile preparations advanced certifications.

This policy supersedes ASHP policy 0915.

Rationale
ASHP distinguishes between two needs related to pharmacy expertise in sterile compounding: a need for new pharmacy graduates to possess baseline training and knowledge of sterile compounding, and the need for pharmacists with an advanced body of knowledge on sterile compounding, especially in pharmacy departments where complex compounded sterile preparations (CSPs) are compounded.

Although there is a clear need for students to have a basic understanding of sterile compounding upon graduation, education in colleges of pharmacy on sterile compounding varies. Sterile compounding and aseptic technique instruction are important areas of pharmacy practice to incorporate in the didactic curriculum and during experiential education.

The complexity of intravenous therapy, the risk of errors or patient harm, and new biologic therapies all demand a higher level of expertise in sterile compounding in the pharmacy, however. United States Pharmacopeia Chapter 797 and other efforts have increased the focus on the quality of CSP compounding and have prompted organizations to improve staff training, facilities, and procedures. In such an environment, there is a clear need for pharmacists whose education, training, and experience in sterile compounding provide expertise rather than baseline knowledge. To demonstrate competency, pharmacy technicians should attain PTCB’s advanced Compounded Sterile Preparation Technician (CSPT) certification, and pharmacists, the Board of Pharmacy Specialties (BPS) Compounded Sterile Preparations Pharmacy (BCSCP) certification.

1912
PHARMACY TECHNICIAN TRAINING AND CERTIFICATION
Source: Council on Education and Workforce Development
To advocate for adoption of a national standard for accreditation of pharmacy technician education and training programs; further,
To advocate that a pharmacy technician education and training program accredited by ASHP and the Accreditation Council for Pharmacy Education (ACPE) be required for all new pharmacy technicians by the year 2022; further,

To advocate that all pharmacy technicians be required to obtain and maintain Pharmacy Technician Certification Board certification; further,

To foster expansion of ASHP/ACPE-accredited pharmacy technician education and training programs.

This policy supersedes ASHP policy 1609.

Rationale
In January 2017, the Pharmacy Technician Certification Board (PTCB) suspended the condition that by 2020 the completion of an accredited technician education and training program would be required to be eligible for the PTCB certification exam. There is no indication that PTCB will reinstate that requirement; however, ASHP supports completion of an education and training program accredited by ASHP and the Accreditation Council for Pharmacy Education (ACPE) as well as PTCB certification for all pharmacy technicians. Although education requirements have been added by PTCB to take the certification exam starting in 2020, completion of an accredited education and training program is only one pathway for eligibility for the exam; PTCB also recognizes equivalent work experience. If an applicant has completed an unaccredited program, there is a required attestation for the content of that program.

In 2018, ASHP and ACPE developed revised national standards that serve as a guide for the development of ASHP/ACPE-accredited pharmacy technician education and training programs. These standards serve as the criteria for the evaluation of new and established pharmacy technician training programs and will help ensure that pharmacy technicians possess the knowledge, skills, and abilities necessary for their critical role on the healthcare team. A number of environmental factors, including changes in state laws allowing for expanded roles, responsibilities, and authority for pharmacy technicians, prompted the reassessment of the standards, which were last revised in 2015. ASHP supports more uniform state statutes and regulations regarding pharmacy technicians. The anticipated increase in demand for enrollment in ASHP/ACPE-accredited training programs will require an expansion of the number and distribution of such programs, including innovative education and training formats.

The target date of 2022 was included to provide a goal for requiring that all new pharmacy technicians in hospitals and health systems complete a pharmacy technician education and training program accredited by ASHP and ACPE. The date is in line with the initiatives and timeline of the Stakeholder Advisory Committee (the Committee). This Committee continues to advance the recommendations of the Pharmacy Technician Stakeholder Consensus Conference (Toward uniform standards for pharmacy technicians: Summary of the 2017 Pharmacy Technician Stakeholder Consensus Conference), the national consensus conference that engaged all sectors of pharmacy to define basic knowledge, skills,
and abilities of pharmacy technicians, to promote and define advanced competencies, and to promote national definitions and regulation of pharmacy technicians. The Committee uses the recommendations and consensus statements to guide their work. Two of these statements are as follows:

2.1 The profession of pharmacy should move urgently towards the development and adoption of national standards for pharmacy technician education.

2.2 The profession of pharmacy should set a target for implementation of the national standard for pharmacy technician education at 3 to 5 years after adoption of the standard.

The accreditation standard for the education and training of pharmacy technicians was revised and approved by both the ASHP and ACPE Boards in June of 2018. Consistent with recommendation 2.2, 2022 is a reasonable target to require accredited training for new pharmacy technicians as it is four years from the time new standard was developed. The new standard was developed based on a job analysis of more than 44,000 pharmacy technicians in the U.S. The group developing the standard included educators; representatives from community, hospital, and chain pharmacy practice; and members of the Pharmacy Technician Accreditation Commission. More than 500 public comments were received and evaluated for inclusion in the revised standard before it was sent to the Boards of ASHP and ACPE for approval. The revised standard is divided into entry level and advanced, as recommended at the Pharmacy Technician Stakeholder Consensus Conference. This differentiation allows practice settings to have different education and training requirements based on the needs of the position. Additionally, boards of pharmacy can develop requirements based on entry-level competencies as a minimum standard and the advanced level can be an added credential that can be pursued based on employer requirements.

The Committee is currently working with the National Association of Boards of Pharmacy (NABP) to modify the Model State Pharmacy Act and Model Rules of the National Association of Boards of Pharmacy. At the NABP national meeting in May 2019, a resolution was passed to convene a task force of stakeholders to evaluate and make recommendations to NABP regarding the education requirements, practice responsibilities, and competence assessments for pharmacy technicians.

Additionally, work is being done at the state level with individual boards of pharmacy to evaluate requirements for accredited education and training for new pharmacy technicians. This activity follows consensus statement 5.2: The level of urgency for achieving state-to-state consistency in regulation of pharmacy technicians’ scope of practice, education, certification, and licensure or regulation is high.

At the state level, advocacy will include several specific issues for boards of pharmacy to include as they consider regulations for technicians:

- There should be clear distinctions between pharmacy technicians and student pharmacists. Technician requirements should not be applied to student pharmacists.
- There should be a provision for a “technician in training” that would allow a technician who is enrolled in an accredited education and training program to be eligible to work in a pharmacy as long they complete the program in some prescribed amount of time (e.g., 12-18 months).
1913

PHARMACEUTICAL DISTRIBUTION SYSTEMS

Source: Council on Pharmacy Management

To support drug distribution business models that meet the requirements of hospitals and health systems with respect to availability and timely delivery of products, minimizing short-term outages and long-term product shortages, managing and responding to product recalls, fostering product-handling and transaction efficiency, preserving the integrity of products as they move through the supply chain, and maintaining affordable service costs; further,

   To oppose manufacturers, distributors, and wholesalers restricting or making availability of drug products contingent on how those products are used; further,

   To encourage selection of a wholesale distributor that (1) purchases products only from a manufacturer before distribution to the purchasing end user; (2) is licensed in the state where it is conducting business; (3) complies with the requirements of the Drug Supply Chain Security Act; (4) is accredited under the National Association of Boards of Pharmacy Verified-Accredited Wholesale Distributors program; and (5) uses information systems that are interoperable with common types of pharmacy systems.

This policy supersedes ASHP policy 1707.

Rationale

Wholesalers and distributors have traditionally contracted with hospitals and health systems for basic drug product distribution and other services. Many wholesalers have made a large portion of their revenue through speculative buying and other business practices that are no longer desirable because of requirements for pedigrees, the risk of buying counterfeit or adulterated products, demands by manufacturers to limit product transactions, and the need to manage drug recalls. These changes, plus the vast diversification of many wholesaler distributors, have resulted in new business models that will affect how hospitals acquire and manage pharmaceuticals. These changing models for distribution may result in higher costs for hospitals and health systems, as current wholesaler distribution systems have become very efficient.

Additionally, some wholesalers have required that pharmacies ensure certain drugs are not used or sold for use for particular purposes, and there are concerns that this practice could grow. ASHP supports wholesaler and distribution business models that meet the requirements of hospitals and health systems, which includes the ability for pharmacies to obtain drug products for established patient care uses without restriction.

ASHP supports using strict vendor vetting policies to prevent sales from nonreputable or gray market vendors. Vendors should purchase products only from a manufacturer, not a secondary source; should be licensed in the state in which it operates; comply with the requirements of the Drug Supply Chain Security Act; be accredited under the National Association of Boards of Pharmacy Verified-Accredited Wholesale Distributors (VAWD)
program; and use information systems that are interoperable with common types of pharmacy systems. VAWD accreditation requires a rigorous criteria compliance review to ensure that a wholesale distribution facility operates legitimately, is licensed in good standing, and employs security and best practices for safe prescription drug distribution from manufacturers to pharmacies. As of 2018, 23 states had recognized VAWD accreditation.

1914
SAFE MEDICATION PREPARATION, COMPOUNDING, AND ADMINISTRATION IN ALL SITES OF CARE

Source: Council on Pharmacy Management

To advocate that all sites of care be required to meet the same regulatory standards for medication preparation, compounding, and administration to ensure safety and quality.

Rationale
As pharmacy costs become increasingly relevant in managing the overall cost of healthcare, third-party payers have increased their attention to sites of care, increasing the pressure to manage this trend. Integrated pharmacy benefit models are working to funnel patients to lower-cost settings and deliver more comprehensive care by leveraging big data.

Consolidation in the pharmacy benefit management sector has resulted in just three major companies. To protect and further grow their margins and fend off disruptive entrants, the big three are reinventing themselves within vertically integrated conglomerates, allowing them to tap into other parts of the healthcare value chain. Patients are increasingly receiving care at nonhospital sites of care, where they can receive the care they need at a lower cost, rather than through traditional venues, such as hospital outpatient infusion centers. In addition to these alternative sites being less expensive for payers and purchasers, patients who seek care from alternative sites often have lower out-of-pocket costs and may perceive these sites as more convenient than traditional sites of care (e.g., emergency departments, hospital-based clinics). This trend has led to lower hospital outpatient revenues. Vertical integration of the healthcare value chain has given payers more control over healthcare costs and has better positioned them to link directly with providers and negotiate value-based contracts. Vertically integrated systems may allow payers to steer patients toward lower cost-of-care options (e.g., providers, pharmacies). In the ASHP Foundation Pharmacy Forecast 2018, 44% of panelists predicted at least 25% of health systems will discontinue or abandon plans to begin drug dispensing services (e.g., distribution of specialty or infusion products) because of insufficient financial margins.

One of the challenges that confronts health systems is the level of infrastructure investment required to adequately address regulatory and accreditation requirements focused on quality and safety (e.g., United States Pharmacopeia Chapters 797 and 800, state boards of pharmacy regulations, and the standards of accreditors such as The Joint Commission and Det Norske Veritas Healthcare). Physician offices, dialysis centers, stand-alone cancer care centers, freestanding neighborhood hospitals, and other nonhospital sites of care are commonly devoid of this same level of regulatory and accreditation scrutiny.
1915
PHARMACY DEPARTMENT BUSINESS PARTNERSHIPS
Source: Council on Pharmacy Management

To recognize that a key objective of pharmacy departments is to provide medication management services across the continuum of patient care, and that pharmacy leaders should proactively evaluate potential business partnerships against this objective; further,

To recognize that hospitals and health-system pharmacy leaders must ensure that business partners meet all applicable patient safety and accountability standards; further,

To provide education and tools for pharmacy leaders to aid in the evaluation of and development of business partnerships; further,

To educate health-system administrators on the importance of pharmacy leadership in evaluating and developing pharmacy-related business partnerships; further,

To encourage health-system pharmacy leaders to consider evolving healthcare financing systems when evaluating and developing business partnerships.

This policy supersedes ASHP policy 1416.

Rationale
Hospitals and health-system pharmacy leaders have to increasingly assess and engage with external business partners in order to facilitate continuity of care for their patients and optimize outcomes. Hospitals and health-system leaders must be positioned to provide the most comprehensive care for their patient populations. As these external entities expand their market share and become more engaged across the healthcare continuum, a significant number of hospitals and health systems are dealing with how to best evaluate potential business partnerships. In some cases hospital or health-system pharmacy leaders are seeking to create a network of pharmacy locations and services for their patients that the health system cannot build itself. In other cases hospital and health-system pharmacy leaders need to engage with external business partners to provide services they cannot provide or to improve the efficiency of services provided by the hospital or health system. Additionally, a number of business entities see changes in value-based purchasing and readmission payment as an opportunity to contract with health systems. Finally, there are also business partners (e.g., data management, automation, compounding, and consulting organizations) that pharmacy leaders need to engage with in order to manage their pharmacy enterprise. These changes have posed a political, logistical, and professional challenge for pharmacy leaders.

1916
INTIMIDATING OR DISRUPTIVE BEHAVIOR
Source: Council on Pharmacy Management
To affirm the professional responsibility of the pharmacist to ensure patient and workplace safety by communicating with other healthcare personnel to clarify and improve medication management; further,

To advocate that hospitals and health systems adopt zero-tolerance policies for intimidating or disruptive behaviors in their institutions; further,

To encourage hospitals and health systems to develop and implement education and training programs for all healthcare personnel to encourage effective communication, set expectations for standards of conduct, promote use of de-escalation techniques, and discourage intimidating or disruptive behaviors; further,

To encourage colleges of pharmacy and residency training programs to incorporate training in communications and managing intimidating or disruptive behaviors; further,

To collaborate with other organizations to advocate codes of conduct that do not allow intimidating or disruptive behavior in hospitals and health systems; further,

To encourage hospitals and health systems to adopt processes for identification and reporting of intimidating or disruptive behaviors to evaluate and mitigate unacceptable behaviors in a timely and effective manner.

This policy supersedes ASHP policy 0919.

**Rationale**

Intimidating or disruptive behaviors can lead to medical errors, contribute to poor patient satisfaction, increase costs, and cause staff turnover. Such behaviors range from passive behaviors such as providers refusing to answer questions or return pages to use of condescending language to overt actions such as verbal outbursts or physical threats. The Institute for Safe Medication Practices conducted a national survey regarding intimidation in the workplace in 2003 and conducted a follow-up survey in 2013 for comparison. There has been no reduction between 2003 and 2013 in the percentage of respondents who were aware of a medication error during the year in which disrespectful behavior played a role.

In addition, healthcare workers face an increased risk of work-related assaults resulting primarily from intimidating or disruptive behavior of patients and their caregivers or family members. Disruptive behavior, including interference with treatment plans, vulgar language, and threatening statements, can impede a healthcare worker’s ability to provide safe and effective care. While such behavior is often overlooked, underreported, or considered to be part of the job, it can also lead to more serious confrontations. Unfortunately, there is no clear way to identify patients or family members who will be disruptive to healthcare personnel, so every patient and family member must be treated with the same level of caution.

According to the Bureau of Labor Statistics and National Crime Victimization Survey, more assaults occur in the healthcare and social services industries than in any other industry.
For healthcare workers, assaults comprise 10-11% of workplace injuries involving days away from work, compared with 3% of injuries of all private sector employees. Further, it has been identified that workplace violence can harm a person’s intrinsic sense of self-worth and confidence, which can result in physical symptoms including headaches, anxiety, and depression. The American Nurses Association and the American Medical Association have taken positions concerning violence against healthcare workers and are actively promoting solutions to address the issue.

ASHP believes organizations should develop training programs to discourage disruptive behaviors and to train employees in handling disruptive situations, including de-escalation techniques, and colleges of pharmacy and residency training programs should also provide such training. These organizational efforts will help with compliance with The Joint Commission leadership standard on disruptive behavior (LD.03.01.01), which suggests that healthcare organizations should “educate all team members – both physicians and non-physician staff – on appropriate professional behavior defined by the organization’s code of conduct. The code and education should emphasize respect. Include training in basic business etiquette (particularly phone skills) and people skills.”

1917

PHARMACY TECHNICIAN STUDENT DRUG TESTING

*Source: Pharmacy Technician Forum*

To advocate for the use of pre-enrollment, random, and for-cause drug testing as a mandatory component throughout any accredited or unaccredited pharmacy technician training program and practice experience, based on defined criteria with appropriate testing validation procedures; further,

To encourage pharmacy technician training programs to develop policies and processes to identify impaired individuals; further,

To encourage pharmacy technician training programs to facilitate access to and promote programs for treatment and to support recovery; further,

To encourage pharmacy technician training programs to use validated testing panels that have demonstrated effectiveness detecting commonly misused, abused, or illegally used substances.

*Rationale*

Pharmacy technicians are essential members of the healthcare team and help ensure the health, safety, and welfare of patients. They have access to controlled substances and confidential information, and operate in settings that require the exercise of good judgment and ethical behavior. In addition, some state boards of pharmacy have reported that drug-abusing and -diverting persons are enrolling in pharmacy technician training programs to access drugs during experiential training and employment. Thus, an assessment of a pharmacy
technician student’s possible impairment, which could diminish his or her capacity to function in such a setting, is imperative to promote the highest level of integrity in healthcare services.

ASHP recognizes that drug testing pharmacy technician students, whose responsibilities may bring them into contact with controlled substances, is an essential element of diversion prevention programs. Pre-enrollment, random, and for-cause drug testing should be performed based on defined criteria, with appropriate testing validation procedures, and have demonstrated effectiveness detecting commonly abused or illegally used substances.

**1918**

**MINIMUM EDUCATIONAL QUALIFICATION STANDARDS FOR PHARMACISTS**

*Source: House of Delegates Resolution*

To support minimum educational qualification standards for pharmacists to practice pharmacy that are consistent with the licensing standards of state boards of pharmacy; further,

To oppose the basic education requirement within the Office of Personnel Management Classification & Qualifications - General Schedule Qualification Standards - Pharmacy Series, 0660, requiring a Doctor of Pharmacy or Doctor of Philosophy degree as the minimum qualification to practice pharmacy.

**Rationale**

In September 2017, the U.S. Office of Personnel Management (OPM) issued a new qualification standard for pharmacists, GS-0660. The new standard lists the basic educational requirement for pharmacists as a Doctor of Pharmacy (Pharm.D.) or Doctor of Philosophy (Ph.D.) degree. To set this requirement, OPM must have determined that pharmacy cannot be performed by persons without one of these degrees, because Title 5 U.S.C. 3308 permits the establishment of minimum educational requirements only when OPM has determined that the work cannot be performed by persons who do not possess the prescribed minimum education.

All 50 states currently allow pharmacists with a bachelor’s degree in pharmacy (B.S.Pharm.) to obtain licensure and practice pharmacy, which indicates that all state legislatures or regulators have concluded that pharmacists with a B.S.Pharm. degree can practice pharmacy safely and effectively. In the U.S., the B.S.Pharm. degree was awarded until 2005; in 2006, the Pharm.D. degree became the only entry-level degree awarded. A 2014 survey of the pharmacy workforce found that only 40% of pharmacists had earned a Pharm.D. The minimum educational requirements set by OPM would automatically disqualify 60% of pharmacists from entering the federal government workforce, an inequitable practice not seen outside the federal sector. The OPM minimum educational requirement also creates a monumental challenge to building and maintaining the pharmacist workforce the Department of Defense needs to support U.S. warfighting efforts and take care of veterans. ASHP recognizes that pharmacists must possess the education, training, and experience required to effectively, efficiently, and responsibly fulfill their roles. Further, ASHP supports licensure by a state board of pharmacy as the minimum requirement for pharmacy practice in its Minimum Standard for Pharmacies in Hospitals.
1919
ASHP STATEMENT ON THE ROLE OF THE MEDICATION SAFETY LEADER
Source: Section of Inpatient Care Practitioners
To approve the ASHP Statement on the Role of the Medication Safety Leader.

This statement supersedes a previous version dated April 13, 2012.

1920
RESEARCH ON DRUG USE IN OBESE PATIENTS
Source: Council on Therapeutics
To encourage drug product manufacturers to conduct and publish pharmacokinetic and pharmacodynamic research in obese patients to facilitate safe and effective dosing of medications in this patient population, especially for medications most likely to be affected by obesity; further,

To encourage manufacturers to include in the Food and Drug Administration (FDA)–approved labeling detailed information on characteristics of individuals enrolled in drug dosing studies; further,

To advocate that the FDA develop guidance for the design and reporting of studies that support dosing recommendations in obese patients; further,

To advocate for increased enrollment and outcomes reporting of obese patients in clinical trials of medications; further,

To encourage independent research on the clinical significance of obesity on drug use, as well as the reporting and dissemination of this information via published literature, patient registries, and other mechanisms; further,

To recognize that pharmacists are medication therapy experts who should provide guidance on appropriate drug dosing for obese patients.

This policy supersedes ASHP policy 1515.

Rationale
Given the growing rate of obesity in the United States, ASHP is concerned about the uncertainty surrounding how obesity affects drug dosing, effectiveness, and safety, especially for medications most likely to be affected by obesity (defined as body mass index of >30 kg/m²). The FDA does not require that studies of obese patient populations be performed, despite the growing proportion of obese patients in United States. Obese patients are subject to variable pharmacokinetic effects of oral, parenteral, and topical therapeutic agents.

Drug product manufacturers should be encouraged to complete pharmacokinetic and pharmacodynamic dosing studies of obese patients, especially for drugs for which obesity is...
expected to have a significant clinical impact (e.g., antimicrobials, highly lipophilic drugs). If these voluntary studies are not completed, then manufacturers should include in the FDA-approved labeling complete information on the population enrolled in dosing studies and the methods used to determine dosing so that clinicians can assess the extent to which that population reflects patients being treated.

ASHP advocates that the FDA develop guidance for voluntary drug dosing studies of obese patients that would define study design and reporting with the intent of standardizing this research to the extent possible. The need for this guidance is supported by the complexity of drug dosing for obese patients, which varies based on drug and patient characteristics. A paucity of research in this population is noted, similar to the lack of preapproval studies in geriatric and pediatric patients. Such studies could help standardize research methods and promote comparative effectiveness research. ASHP also encourages independent clinical and practice-based research to further define clinical use of drugs in the treatment of obese patients, as well as clinician reporting of patient experience in articles and clinical registries.

ASHP also believes that pharmacists are uniquely positioned to review and apply this literature to make dosing recommendations based the most appropriate weight classification for obese patients, including ideal body weight, adjusted body weight, or total body weight.

1921
TESTING AND DOCUMENTATION OF PENICILLIN ALLERGY AS A COMPONENT OF ANTIMICROBIAL STEWARDSHIP
Source: Council on Therapeutics

To advocate involvement of pharmacists in the clarification and assessment of penicillin allergy, intolerance, and adverse drug events; further,

To advocate for documentation and de-labeling of penicillin allergies, intolerances, reactions, and severities in the medical record when appropriate to facilitate optimal antimicrobial selection; further,

To recommend the use of penicillin skin testing, graded antibiotic challenges, and oral direct challenges in appropriate candidates when clinically indicated to optimize antimicrobial selection; further,

To support the education and training of pharmacists in the assessment, management, and documentation of penicillin allergies, intolerances, and adverse events; further,

To advocate that state board of pharmacy regulations include penicillin allergy skin testing under pharmacists’ scope of practice.

This policy supersedes ASHP policy 1517.

*Rationale*
Approximately 10% of all patients in the United States report having a penicillin allergy; however, only 1 in 10 patients with a labeled penicillin allergy are truly allergic. Furthermore, approximately 80% of patients with an IgE-mediated penicillin allergy lose their sensitivity after
10 years. Specific rates of cross-reactivity between penicillins and cephalosporins vary depending on specific resources, although the likelihood of cross-reactivity is lower than previously described. Historically, it has been estimated that 10% of patients with a true penicillin allergy will experience an allergic reaction if administered a cephalosporin, but this data is from early cross-reactivity studies with potential contamination of early cephalosporin products with penicillin G. More recent data suggest cross-reactivity rates of less than 1%. Cross-reactivity is more closely associated with structurally similar R-1 side chains than with the beta-lactam ring itself.

Penicillin allergies have led to considerable public health risks and unintended consequences, including receipt of more broad-spectrum antibiotics, suboptimal therapy for infectious disease management, more antibiotic-related costs, increased risk of adverse effects, and increased risk of methicillin-resistant *Staphylococcus aureus* and *Clostridioides difficile*. As such, structured and thorough interview assessments with appropriate documentation and de-labeling of penicillin allergies are necessary to combat these potential negative consequences of labeled penicillin allergies. Penicillin skin testing and graded or oral challenges are excellent opportunities to assist in the assessment and de-labeling of penicillin allergies. Although pharmacists are well positioned to be involved in these processes, state boards of pharmacy have different regulations regarding whether penicillin skin testing is within pharmacists’ scope of practice. Penicillin allergy assessment, management, and documentation are excellent opportunities to improve pharmacist involvement in patient care and to improve antimicrobial stewardship initiatives for health systems, and offer a potential opportunity for pharmacists to bill for their services.

The American Academy of Allergy, Asthma, and Immunology, as part of the *Choosing Wisely* campaign, recommends against the overuse of non-beta-lactam antibiotics in patients with a history of penicillin allergy, without appropriate evaluation. In a research abstract from the Canadian Society of Allergy and Clinical Immunology meeting in 2014, researchers found that only 15% of hospital-discharged patients notified a family physician of a negative penicillin allergy evaluation; at the same time, 30% were still listed as penicillin allergic upon readmission to the hospital. Additionally, the existence of a pharmacist-provided allergy skin test has proven to positively impact patient care by optimizing antibiotic regimens and accelerate discharges for patients while reducing healthcare costs.

1922

**ANTIMICROBIAL USE IN AGRICULTURE**

*Source: Council on Therapeutics*

To advocate that the Food and Drug Administration (FDA) eliminate future approval of antimicrobials for nontherapeutic uses in agricultural animals that represent a safety risk by contributing to antimicrobial resistance; further,

To encourage efforts to phase out and eliminate the nontherapeutic uses of antimicrobials previously approved by the FDA; further,

To support the therapeutic use of antimicrobials in animals only under the supervision of a veterinarian; further,
To encourage the agricultural industry to report to the appropriate regulatory bodies the specific antimicrobials used, the purpose or indication for their use, and the settings in which they are used; further,

To encourage the FDA, Centers for Disease Control and Prevention, and other stakeholders to monitor and limit, when effective alternatives are available, the therapeutic use of antimicrobials that are essential to the treatment of critically ill human patients; further,

To advocate for the inclusion of pharmacists in antimicrobial surveillance and related public health efforts based on pharmacists’ knowledge of antimicrobial drug products and antimicrobial resistance.

This policy supersedes ASHP policy 1009.

Rationale

The use of antibiotics in animal agriculture represents the majority of antibiotic use worldwide and poses significant public health risks. Approximately 80% of antibiotic consumption in the U.S. is dedicated to agricultural purposes. Despite warnings and risks, antibiotics are still excessively used for growth promotion, feed efficiency, and disease prevention in animal agriculture.

ASHP supports the public health approach to antimicrobial use in agricultural animals outlined in the July 2010 FDA testimony to Congress. The goal of this approach is to minimize the development of antimicrobial resistance, preserving the effectiveness of antimicrobial therapies that are critical in human medicine. According to the FDA, an enhanced action plan would seek to phase out the use of antimicrobials for nontherapeutic purposes (e.g., animal growth promotion, food efficiency) by eliminating future approvals for new nontherapeutic indications. ASHP also supports the FDA’s request for increased statutory authority that would facilitate removal of previously approved nontherapeutic uses of antimicrobials. This two-pronged approach is critical to preserving the effectiveness of existing antimicrobials as well as those in development. ASHP opposes nontherapeutic uses but supports animal use of antimicrobials for therapeutic purposes (e.g., treatment of disease or prevention of disease in animals within a population that has documented disease) when this use occurs under the supervision of a veterinarian. Reporting of the specific antimicrobials used, the purpose or indication for their use, and the settings in which they are used would support achievement of the FDA’s action plan. In addition, ASHP advocates that FDA approval and subsequent use of antimicrobials should take into consideration the public health impact of the drugs’ use. Pharmacists’ knowledge of antimicrobial drugs and antimicrobial resistance will be critical to these efforts, including the identification of antimicrobial classes for which animal treatment use should be minimized in order to retain the effectiveness of these drugs for the treatment of critically ill human patients.
1801
UNIT DOSE PACKAGING AVAILABILITY
Source: Council on Pharmacy Management
To advocate that pharmaceutical manufacturers provide all medications used in health systems in unit dose packages or, when applicable, in packaging that reduces medication waste; further,

To urge the Food and Drug Administration to support this goal in the interest of public health and healthcare worker and patient safety.

This policy supersedes ASHP policy 0309.

Rationale
The benefits of unit dose drug administration were well established in the 1960s. Despite these benefits, some drugs are not available from manufacturers in unit dose packages. One reason sometimes cited for this lack of availability is that because unit dose packages make up a relatively small portion of business for many manufacturers, some manufacturers are making a business decision to discontinue this form of packaging. When manufacturers do not provide drugs in unit dose form, the pharmacy must repackage them, introducing opportunities for error. Although it may not be practical for FDA to mandate unit dose packaging to improve public health and patient safety, FDA could encourage such packaging in other ways, such as by developing packaging guidelines for the pharmaceutical industry. In cases in which unit dose packaging is not practical, manufacturers should at a minimum provide package sizes that reduce medication waste.

1802
GENE THERAPY
Source: Council on Pharmacy Management
To assert that health-system decisions on the selection, use, and management of gene therapy agents should be managed as part of the medication formulary system in that (1) decisions are based on clinical, ethical, legal, social, philosophical, quality-of-life, safety, comparative effectiveness, and pharmacoeconomic factors that result in optimal patient care; and (2) such decisions must include the active and direct involvement of physicians, pharmacists, and other appropriate healthcare professionals; further,

To advocate that gene therapy be documented in the permanent patient health record; further,

To advocate that documentation of gene therapy in the permanent patient health record accommodate documentation by all healthcare team members, including pharmacists.
This policy supersedes ASHP policy 0103.

Rationale
The first biologics license agreement for a gene therapy product was submitted to the Food and Drug Administration in May 2017. Gene therapy is an emerging area of medicine, and pharmacists should take a leadership role in managing these therapies and associated devices under the medication formulary systems in their institutions.

As described in more detail in the ASHP Statement on the Pharmacy and Therapeutics Committee and the Formulary System, a fundamental characteristic of the formulary system is that all decisions are made based on factors that result in optimal patient care, include the involvement of appropriate healthcare professionals, and are not based solely on economic factors. It is important that gene therapy be documented in the permanent patient health record to ensure accurate and complete documentation of the care provided to patients and to validate the impact of therapies on patient outcomes and that all healthcare providers involved in providing gene therapy, including pharmacists, be able to document the patient care provided.

1803
CONFIDENCE IN THE U.S. DRUG APPROVAL AND REGULATORY PROCESS
Source: Council on Public Policy

To support and foster legislative and regulatory initiatives designed to improve public and professional confidence in the drug approval and regulatory process in which all relevant data are subject to public scrutiny.

This policy supersedes ASHP policy 9010.

Rationale
Patients, healthcare providers, and private and public payers need objective, authoritative, and reliable evidence about drugs in order to make the best treatment decisions. The basis of the trust in the Food and Drug Administration (FDA) drug approval and regulatory process is public scrutiny of the data used in its decision-making. ASHP supports efforts to improve public and professional confidence in the FDA’s drug approval and regulatory process by expanding public access to relevant data used in FDA decision-making.

1804
DRUG DOSING IN CONDITIONS THAT MODIFY PHARMACOKINETICS OR PHARMACODYNAMICS
Source: Council on Therapeutics

To encourage research on the pharmacokinetics and pharmacodynamics of drugs in acute and chronic conditions; further,
To advocate healthcare provider education and training that facilitate optimal patient-specific dosing in populations of patients with altered pharmacokinetics and pharmacodynamics; further,

To support development and use of standardized models, laboratory assessment, genomic testing, utilization biomarkers, and electronic health record documentation of pharmacokinetic and pharmacodynamic changes in acute and chronic conditions; further,

To collaborate with stakeholders in enhancing aggregation and publication of and access to data on the effects of such pharmacokinetic and pharmacodynamic changes on drug dosing within these patient populations.

This policy supersedes ASHP policy 1720.

Rationale
The pharmacokinetic and pharmacodynamic properties of drugs found in drug information monographs are based on the drug’s absorption, distribution, metabolism, and excretion in healthy, adult patients during Phase I of a drug’s clinical trials. Many patients receiving drug therapy do not fit this profile, and many have compromised organ function. The medical community has long recognized the need for a standardized approach to evaluating organ system dysfunction. Although there are methods to determine organ function (e.g., the Cockcroft-Gault equation for renal function or the Child-Turcotte-Pugh Classification for Severity of Cirrhosis), there is debate as to whether these methods are true indicators of organ function, as the components that comprise these equations may fluctuate based on severity and patient status. Traditional laboratory values used to evaluate organ dysfunction can be bidirectional and conflicting as well.

In addition, with the exception of adjustments for renal dysfunction, there is not much information regarding dosage adjustment for specific drugs. Many organ systems are involved in a drug’s absorption, distribution, metabolism, and excretion. Hepatic effects, for example, are a risk area, as those effects are slower to be seen and have not been the subject of much research, and the number of drugs affected are smaller in number than renally excreted drugs. Both acute and chronic aspects of patient conditions may require monitoring and adjustment, including sepsis, encephalopathies, pregnancy, heart failure exacerbations, and cystic fibrosis. Certain protocols, such as therapeutic hypothermia, can also have clinically significant impact on a drug’s pharmacokinetic and pharmacodynamic behavior. There is also need to promote research and utilization of biomarkers into practice, as these may reflect organ function and may provide pharmacists with a more complete clinical picture.

Given the complex dose adjustments and variety of conditions, education of pharmacists and other healthcare professionals is critically important to appropriately treat patients.

1805
MEDICATION FORMULARY SYSTEM MANAGEMENT
This policy was superseded by ASHP policy 2016

Click policy number or title to view policy.
*Rationale follows policy language.
1806
MANUFACTURER-SPONSORED PATIENT ASSISTANCE PROGRAMS
Source: Council on Pharmacy Management

To advocate that pharmaceutical manufacturers extend their patient assistance programs (PAPs) to serve the needs of both uninsured and underinsured patients, regardless of distribution channels; further,

To advocate expansion of PAPs to inpatient settings; further,

To advocate that pharmaceutical manufacturers and PAP administrators enhance the efficiency of PAPs by standardizing application criteria, processes, and forms; further,

To advocate that pharmaceutical manufacturers and PAP administrators enhance access to and visibility of PAPs to pharmacy personnel and other healthcare providers; further,

To encourage pharmacy personnel, other healthcare providers, and pharmaceutical manufacturers to work cooperatively to ensure PAPs include the essential elements of pharmacist patient care, are patient-centered, and are transparent; further,

To develop education for pharmacy personnel and other healthcare providers on the risks and benefits of PAPs.

This policy supersedes ASHP policy 1420.

Rationale
ASHP recognizes the value of patient assistance programs (PAPs) in improving continuity of care while controlling costs and advocates expanded use of these programs for uninsured and underinsured patients in ambulatory and inpatient care settings. Some organizations have demonstrated success in achieving the benefits of these programs through dedicated resources and a mastery of the many programs available. Simplification of these programs (similar eligibility criteria, a common data format) would reduce the resources required to participate and improve access and utilization. ASHP notes that while the number of PAPs in ambulatory care settings has increased, there has been little growth in programs for inpatients. Hospitals must then absorb the costs of patient care, which results in fewer resources in the overall healthcare system. ASHP believes that expansion of PAPs to indigent inpatients would significantly offset some of the costs to hospitals and ultimately improve care. In addition, interprofessional cooperation will be needed to support patients in accessing drug products when the PAP doesn’t cover the cost of the drug product due to high deductibles or co-pays. To ensure that these programs achieve their objectives, ASHP advocates that development of these programs ensure that they contain the elements of pharmacist patient care.

1807
REIMBURSEMENT AND PHARMACIST COMPENSATION FOR DRUG PRODUCT DISPENSING

Click policy number or title to view policy.
*Rationale follows policy language.
Source: Council on Pharmacy Management

To collaborate with payers in developing improved methods of reimbursing pharmacies and pharmacists for the costs of drug products dispensed, pharmacy and pharmacist services, and associated overhead; further,

To educate pharmacists and stakeholders about those methods.

This policy supersedes ASHP policy 1304.

Rationale
In well-intentioned efforts to reduce healthcare costs, public and private payers often seek to minimize the reimbursement to pharmacies for drug products. Historically, those reimbursements have sometimes exceeded the simple cost of the drug product to reimburse pharmacies for associated costs (e.g., storage, compounding, preparation, dispensing). Because cost-management efforts are likely to continue to reduce pharmacy reimbursement, other means of compensating pharmacies for those expenses will need to be found, and pharmacists and other stakeholders will require education about those reimbursement methods. In addition, pharmacists and pharmacies need to be reimbursed for professional services associated with management of medications and related patient care.

1808
PATIENT ACCESS TO PHARMACIST CARE WITHIN PROVIDER NETWORKS
Source: Council on Pharmacy Management

To advocate for laws and regulations that require healthcare payer provider networks to include pharmacists and pharmacies providing patient care services within their scope of practice when such services are covered benefits; further,

To advocate for laws and regulations that allow pharmacists and pharmacies to participate as a provider within a healthcare payer's network if the pharmacist or pharmacy meets the payer's criteria for providing those healthcare services; further,

To acknowledge that healthcare payers may develop and use criteria to determine provider access to its networks to ensure the quality and viability of healthcare services provided; further,

To advocate that healthcare payers be required to disclose to pharmacists and pharmacies applying to participate in a provider network the criteria used to include, retain, or exclude pharmacists or pharmacies.

Rationale
As hospitals and healthcare organizations have become more engaged in developing ambulatory care services, pharmacists working in those settings increasingly find themselves excluded from healthcare payer networks. ASHP acknowledges that healthcare payers may
develop and use criteria to determine provider access to its networks to ensure the quality of services and the financial viability of providers (i.e., ensuring sufficient patient volume to profitably operate), but when creating provider networks, payers should include pharmacists and pharmacies providing patient care services within their scope of practice when such services are covered benefits. To ensure equal treatment for healthcare providers, payers should be required to disclose to those applying to participate in a provider network the criteria used to include, retain, or exclude providers. When pharmacists obtain provider status, the infrastructure required to implement direct, independent patient care and billing for provider-based services needs to be in place and accessible. Ensuring pharmacists and pharmacies have the opportunity to engage and have access to payers and payer networks will improve patient access to pharmacists’ care.

1809
HEALTH INSURANCE POLICY DESIGN
*Source: Council on Pharmacy Management*

To advocate that all health insurance policies be designed and coverage decisions made in a way that preserves the patient–practitioner relationship; further,

To advocate that health insurance payers and pharmacy benefit managers provide public transparency regarding and accept accountability for coverage decisions and policies; further,

To oppose provisions in health insurance policies that interfere with established drug distribution and clinical services designed to ensure patient safety, quality, and continuity of care; further,

To advocate for the inclusion of hospital and health-system outpatient and ambulatory care services in health insurance coverage determinations for their patients.

This policy supersedes ASHP policy 1520.

*Rationale*

Evolving practices by health insurers are negatively affecting patient care decisions and impacting the relationships between patients and their care providers. One common health insurance practice restricts management of and access to certain drugs to specialty suppliers. Another problematic practice is that certain drugs are not reimbursed by the insurer when used as part of the patient’s hospital or health-system care. Medicare, for example, deems certain drugs as self-administered drugs, which are not reimbursed when provided to a patient because they are not considered integral to the reason for admission. These practices increase the number of patients that “brown bag” medications when they are admitted to a hospital to avoid being charged personally for the uncovered medications. ASHP has identified a number of concerns about these practices, including impact on continuity of care, integrity of the drug supply, patient satisfaction, and public perception of healthcare organizations.
It is the responsibility of the pharmacist to ensure the integrity of drugs used in the care of patients in the healthcare facility in which he or she practices. Having to verify products that patients bring with them from multiple suppliers disrupts the care process. Having patients go unreimbursed for a medication because it was administered in and supplied by the healthcare organization is confusing to the patient and damaging to the patient–provider relationship. More broadly, lack of understanding of the differing payment systems in different care settings leads to public relations challenges. In addition, the lack of transparency regarding how payers make certain coverage determinations and apply performance penalties (e.g., direct and indirect remuneration fees) creates a significant challenge for healthcare providers as they care for patients.

ASHP advocates reforming these insurance practices. Coverage of medications should not interfere with the safe and effective provision of care and should recognize the responsibility of pharmacists to ensure product integrity for care provided where they practice. In addition, ASHP advocates that the Centers for Medicare & Medicaid Services, commercial payers, and others include hospital and health-system outpatient and ambulatory care services in health insurance coverage determinations for their patients.

1810
PHARMACY ACCREDITATIONS, CERTIFICATIONS, AND LICENSES

Source: Council on Pharmacy Management

To advocate that healthcare accreditation, certification, and licensing organizations include providers and patients in their accreditation and standards development processes; further,

To advocate that healthcare accreditation, certification, and licensing organizations adopt consistent standards for the medication-use process, based on established evidence-based principles of patient safety and quality of care; further,

To encourage hospitals and health systems to include pharmacy practice leaders in decisions about seeking recognition by specific accreditation, certification, and licensing organizations; further,

To advocate that health-system administrators, including compliance officers and risk managers, allocate the resources required to support medication-use compliance and regulatory demands.

This policy supersedes ASHP policy 1303.

Rationale
Pharmacy leaders have years of experience managing the demands and challenges of ensuring that pharmacy services meet the standards of accreditation organizations. Until recently, this responsibility was predominantly achieved through accreditation by The Joint Commission (TJC) and compliance with state laws and Board of Pharmacy regulations, as well as with federal
requirements (e.g., those of the Drug Enforcement Administration). Healthcare organizations with ambulatory care services (e.g., home infusion, specialty pharmacy, and durable medical equipment) have had to manage the additional accreditation process for these business units. Until recently, the number of accreditation standards pharmacy leaders needed to be knowledgeable about was limited. Three recent phenomena have increased this challenge for pharmacy leaders: (1) TJC is no longer the only accreditor for hospitals and health systems; (2) healthcare organizations are developing or acquiring new business units that have their own accreditation processes that need to be integrated into existing ones; and (3) new accreditation, certification, or licensure processes have been created for services and businesses that fall under the responsibility of pharmacy leaders.

The expansion of healthcare organizations and the growth of the pharmacy enterprise are creating a new environment with multiple accreditors and regulators, creating the challenge of compliance with overlapping accreditation, certification, and regulatory standards. Examples include the Michigan Board of Pharmacy requirement to obtain certification to conduct compounding and the California Board of Pharmacy requirement that each IV hood must have its own pharmacy license. In addition, community pharmacy accreditation processes and standards are being implemented that pharmacy leaders need to consider as well.

ASHP recognizes the difference between certifications that are the sole responsibility of and have a direct impact on a pharmacy and certifications of a healthcare organization’s service line (e.g., stroke or transplant services) that are the responsibility of the organization but have medication management components that need to be addressed by the pharmacy. Pharmacists and pharmacy departments are being challenged by a growing number of required accreditations, certifications, and licensures, which result in increased need for pharmacist-in-charge designations, workforce fatigue, and direct and indirect costs.

1811
USE OF INTERNATIONAL SYSTEM OF UNITS FOR PATIENT- AND MEDICATION-RELATED MEASUREMENTS
Source: Council on Pharmacy Practice

To advocate that the U.S. healthcare system adopt and only use the International System of Units (SI units) for all patient- and medication-related measurements and calculations; further,

To advocate that healthcare organizations use clinical decision support systems, equipment, and devices that allow input and display of patient- and medication-related measurements and calculations in SI format only; further,

To advocate that health information technology manufacturers utilize only SI units in their product designs for patient- and medication-related measurements; further,

To promote education in the use of SI units and the importance of using SI units to prevent medical errors.

Click policy number or title to view policy.
*Rationale follows policy language.
**Rationale**

National healthcare, quality, and safety organizations have for years promoted the sole use of SI units for dosing and weight measurements. Errors in conversion from pounds to kilograms have caused two-fold overdosing and significant underdosing, particularly among pediatric patients, where even small dosing changes can have profound effects. Conversion to and from English units of volume (e.g., from milliliters to teaspoons) has long been identified as a source of dosing errors. These types of errors have been reported in all phases of the medication-use process (e.g., prescribing, preparation, dispensing, and administration) in all patient care settings.

Official labeling for U.S. drug products provides weight-based dosing only in SI units (e.g., mg/kg), so use of any other units introduces a risk of error. ASHP endorses national and institutional efforts to standardize the measurement and communication of patient weight using only SI units (i.e., grams and kilograms) but recognizes that other patient measures are sometimes used in dosing and other health-related calculations (e.g., body surface area, creatinine clearance, glomerular filtration rate, body mass index, or adjusted body weight). ASHP therefore advocates sole use of SI units by healthcare providers during prescribing, preparation, dispensing, and administration of medications in all patient care settings. To promote that practice, clinical decision support systems (e.g., electronic health record) and equipment (e.g., scales, stadiometers, infusion pumps) be structured to allow input and display of patient-related measurements and calculations in SI format only. Finally, education in how to use SI units, and about the importance of using SI units to prevent medical errors, will be required to overcome cultural resistance by healthcare providers, caregivers, and patients regarding SI unit use.

1812

**AVAILABILITY AND USE OF APPROPRIATE VIAL SIZES**

*Source: Council on Pharmacy Practice*

To advocate that pharmaceutical manufacturers provide drug products in vial sizes that reduce pharmaceutical waste and enhance safety; further,

To collaborate with regulators, manufacturers, and other healthcare providers to develop best practices on the safe and appropriate use of single-dose, single-use, and multiple-dose vials.

**Rationale**

A 20 study estimated that the U.S. may spend close to $2 billion on oncology drug products that are discarded because they come in vials in which the volume of drug product exceeds what is needed for most doses. Since that landmark study, policymakers, healthcare providers, and payers have been calling for action on vial sizes. The Centers for Medicare & Medicaid Services (CMS) has begun to require that billing for Part B drug products distinguish between claims for those received by a patient and those for discarded drug product, and the Office of the Inspector General (OIG) of the Department of Health and Human Services has initiated a study to determine the cost of such waste. Considerable savings could be gained if vial sizes more
closely matched doses, and one of the goals of the OIG study is to determine how much could be saved by using vial sizes available overseas that more closely match doses. As one analysis has pointed out, pharmacoeconomic analyses done in the U.S. typically do not incorporate leftover drug product in cost calculations, which may inflate cost-effectiveness ratios, and drug manufacturers may be exploiting that omission. In contrast, the United Kingdom National Institute for Clinical Excellence requires manufacturers to include the cost of leftover drug in manufacturers' submissions, and vials of two cancer drugs studied (bortezomib and pembrolizumab) contain 1 mg and 50 mg, respectively, in the U.K., and 3.5 mg and 100 mg in the U.S. Further, the availability of different vial sizes can enhance patient and worker safety. Vial sizes that more closely match doses can minimize preparation time and steps, reducing employee fatigue and the number of opportunities for error.

ASHP advocates that pharmaceutical manufacturers provide drug products in vial sizes that reduce drug waste (e.g., multiple-dose vials or single-dose vials of differing doses), and that regulators, manufacturers, and healthcare providers cooperate to develop and implement best practices for drug vial optimization.

**1813**

**USE OF CLOSED-SYSTEM TRANSFER DEVICES TO REDUCE DRUG WASTE**

*Source: Council on Pharmacy Practice*

To recognize that a growing body of evidence supports the ability of specific closed-system transfer devices (CSTDs) to maintain sterility beyond the in-use time currently recommended by United States Pharmacopeia Chapter 797, when those CSTDs are used with aseptic technique and following current sterile compounding standards; further,

To foster additional research on and develop standards and best practices for use of CSTDs for drug vial optimization; further,

To educate healthcare professionals, especially pharmacists and pharmacy technicians, about standards and best practices for use of CSTDs in drug vial optimization.

**Rationale**

A 2016 study estimated that the U.S. may spend close to $2 billion on oncology drug products that are discarded because they come in vials in which the volume of drug product exceeds what is needed for most doses. Considerable savings are gained when the leftover contents of those vials are used. One practice that has shown promise in optimizing use of leftover drug product is the use of closed-system transfer devices (CSTDs) to facilitate the transfer of drug product from one reservoir to another. CSTDs prevent the release of hazardous drugs during compounding and administration and have primarily been used throughout the medication-use process to minimize healthcare workers’ exposure to hazardous drugs. Some CSTDs use a mechanical barrier that can also prevent the ingress of environmental contaminants, which has prompted study of their ability to safely prolong the sterility of drug product in vials. A growing number of studies have been generating data that indicate specific CSTDs have the possibility of maintaining sterility and extending in-use time when used under sterile conditions defined by...
United States Pharmacopeia Chapter 797. Although some CSTDs have an FDA-approved indication for use to prevent microbial ingress with studied dwell times of up to 168 hours when maintained in an ISO Class 5 environment using proper aseptic technique, they do not have an explicit indication for extending the in-use time of drug products. Until the data from the studies can be validated and applied, standard-setting entities and regulators will not permit this practice. ASHP therefore advocates that the existing evidence that supports the ability of properly used CSTDs to maintain sterility and extend in-use times be recognized, and encourages research and development of guidance by standard-setting entities and regulators regarding safe use of CSTDs for drug vial optimization.

1814
DIRECT AND INDIRECT REMUNERATION FEES
Source: Council on Public Policy

To advocate that payers and pharmacy benefit managers be prohibited from recovering direct and indirect remuneration fees from pharmacies on adjudicated dispensing claims; further,

To oppose the application of plan-level quality measures on specific providers, such as participating pharmacies.

Rationale
Direct and indirect remuneration (DIR) fees are a growing concern among pharmacies that dispense medications in a retail pharmacy or outpatient clinic setting. Created under the Medicare Part D Program, DIR fees were originally intended as a way for the Centers for Medicare & Medicaid Services (CMS) to account for the true cost of the drug dispensed, including manufacturer rebates and pharmacy concessions. Often these rebates and concessions were unknown until the drug was dispensed and the claim adjudicated. Recently, a concerning trend has emerged in which pharmacy benefit managers (PBMs) charge DIR fees to pharmacy providers, applying their own plan performance measures as a way to assess fees on pharmacies dispensing covered Part D drugs. These fees are problematic for the following reasons:

- The fees are arbitrary and appear to result from an unintended application of measures meant for total plan performance as opposed to pharmacy-level metrics.

- The quality measures applied tend to be based on maintenance medications such as blood pressure or medications used to treat diabetes. These measures were never intended to be applied to specialty medications, or other specialized disease states such as oncology, yet PBMs assess DIR fees against the gross reimbursement for all prescriptions received by pharmacy providers, not just maintenance medications.

- PBMs are not required to define, justify, or explain to providers or to CMS the rationale or process for imposing their DIR fees.
Pharmacies providing specialty medications have been especially hard hit by DIR fees, due to the fee structure. DIR fees can be a flat rate (a fixed amount per dollar per claim) or a percentage (typically 3-9%) of the total reimbursement per claim. When the percentage-based structure is applied, the fees increase markedly for specialty drugs, which are typically much more expensive than maintenance medications.

Even more disturbing is that the fees are assessed retroactively, sometimes months after the claim has been adjudicated, providing no recourse for the pharmacy impacted by the assessment. Questions also remain as to whether Part D plan sponsors have the authority to assess DIR fees on pharmacies. There are no references to DIR fees collected on pharmacies in either the Medicare Modernization Act or corresponding CMS regulations.

DIR fees have led to higher cost-sharing responsibilities for Medicare beneficiaries, causing more of them to enter the Part D “donut hole” in which they are solely responsible for the cost of a drug. Because of higher costs, adherence rates tend to be lower among beneficiaries in the donut hole. These higher costs are a perverse result contrary to the very reason DIR fees were created — passing savings onto beneficiaries.

Pharmacies are not alone in their concern. In January 2017, CMS published a fact sheet expressing concern over DIR fees and cited them as contributing to increased drug costs, beneficiary out-of-pocket spending, and Medicare spending overall. ASHP supports legislation that would address the problem of DIR fees. For example, H.R. 1038/S. 413, the Improving Transparency and Accuracy in Medicare Part D Drug Spending Act, would prohibit Medicare Part D plan sponsors from retroactively reducing payment on clean claims submitted by pharmacies under Medicare Part D.

1815

IMPACT OF DRUG LITIGATION ADS ON PATIENT CARE

Source: Council on Public Policy

To oppose drug litigation advertisements that do not provide a clear and conspicuous warning that patients should not modify or discontinue drug therapy without seeking the advice of their healthcare provider.

Rationale

Many law firms use advertising as a means to generate clients for future litigation, including litigation regarding drugs. These advertisements can generate unnecessary fear for patients taking those drugs and may lead them to modify or discontinue medically necessary therapies. Abruptly discontinuing a drug without consulting a healthcare provider can lead to failed therapy and other adverse effects (e.g., some drugs require a tapered withdrawal to be safely discontinued, and patients on multiple medications may require new dosing or drug interaction assessments). Other than truth-in-advertising laws, there is currently no oversight of these advertisements and no requirement to warn patients about the potential harmful effects of discontinuing their drugs. ASHP agrees with the American Medical Association that such ads should be required to have clear and conspicuous warnings that direct patients to speak with their healthcare providers before modifying or discontinuing any drug therapy.
BIOSIMILAR MEDICATIONS

Source: Council on Public Policy

To encourage the development of safe and effective biosimilar medications in order to make such medications more affordable and accessible; further,

To encourage research on the safety, effectiveness, and interchangeability of biosimilar medications; further,

To support legislation and regulation to allow Food and Drug Administration (FDA) approval of biosimilar medications that are also determined by the FDA to be interchangeable and therefore supports substitution for the reference product without the intervention of the prescriber; further,

To oppose the implementation of any state laws regarding biosimilar interchangeability prior to finalization of FDA guidance; further,

To oppose any state legislation that would require a pharmacist to notify a prescriber when a biosimilar deemed to be interchangeable by the FDA is dispensed; further,

To support the development of FDA guidance documents on biosimilar use, with input from healthcare practitioners; further,

To require postmarketing surveillance for all biosimilar medications to ensure their continued safety, effectiveness, purity, quality, identity, and strength; further,

To advocate for adequate reimbursement for biosimilar medications that are approved by the FDA; further,

To promote and develop education of pharmacists about biosimilar medications and their appropriate use within hospitals and health systems; further,

To advocate and encourage pharmacist evaluation and the application of the formulary system before biosimilar medications are used in hospitals and health systems.

This policy supersedes ASHP policy 1509.

Rationale
A provision in the Patient Protection and Affordable Care Act created a new pathway for the FDA to approve biosimilar products. The FDA approved its first biosimilar application in March 2015 for filgrastim-sndz, and others (e.g., adalimumab-adbm, adalimumab-atto, bevacizumab-awwb, etanercept-szzs, infliximab-abda, infliximab-dyyb) have followed.
At the state level, legislation has been proposed and enacted requiring patient and/or prescriber notification that a biosimilar medication has been interchanged. It is important to note that pharmacists cannot substitute a biosimilar medication unless the FDA has deemed that biosimilar to be interchangeable. As of 2017, 35 states and Puerto Rico have passed biosimilar substitution laws. In some states the prescriber/patient notification is similar to what is required for generic substitution, but in others it goes further. For example, Georgia’s biosimilar law requires the pharmacist to notify the prescriber within 48 hours of dispensing the medication (excluding weekends and holidays).

ASHP recognizes FDA’s authority to determine biosimilar interchangeability, and in cases where biosimilar products are deemed interchangeable, supports substitution for the reference product without the intervention of the prescriber. Further, ASHP opposes the implementation of any state laws regarding biosimilar interchangeability prior to finalization of FDA guidance and opposes any state legislation that would require a pharmacist to notify a prescriber when a biosimilar deemed to be interchangeable by the FDA is dispensed. FDA’s determination of interchangeability should be all that is needed in order to substitute the biosimilar with the reference product. Although FDA guidances are distinct from FDA regulations, they often have profound impacts on healthcare decisions and delivery, so ASHP encourages the FDA to include healthcare practitioners in their development.

ASHP recognizes that postmarketing surveillance and pharmacist evaluation as part of the formulary system before biosimilar use are required to guarantee safe use of biosimilars. ASHP also advocates for adequate reimbursement for biosimilars approved by the FDA.

**1817**

**340B DRUG PRICING PROGRAM SUSTAINABILITY**

*This policy was superseded by ASHP policy 1908.*

**1818**

**FEDERAL QUALITY RATING PROGRAM FOR PHARMACEUTICAL MANUFACTURERS**

*Source: Council on Public Policy*

To advocate that the Food and Drug Administration (FDA) assign quality ratings to pharmaceutical manufacturers based on the quality of their manufacturing processes, sourcing of active pharmaceutical ingredients and excipients, selection of contract manufacturers, and business continuity plans; further,

To advocate that the FDA consider offering incentives for manufacturers to participate in the program.

*Rationale*

Shortages of critical drug products in hospitals and health systems continue to pose a significant threat to public health, and pharmacists and other clinicians are often challenged with locating supplies of life-saving or life-sustaining drug products at a moment’s notice and with very few
options to choose from. While the number of new shortages has fallen considerably since 2011, a number of drug products remain in short supply. Drug product shortages are often caused by a manufacturing problem (e.g., contamination) that halts production until the problem is resolved. To address the issue of quality in drug product manufacturing, the FDA has considered creation of a manufacturing quality initiative that would highlight companies that employ the best quality manufacturing processes by establishing a rating system that would assign a rating to companies based on their level of quality in the manufacturing process. This rating system could be made public to enable prospective customers to see which companies employ the best quality practices. Further, the rating system could serve as a basis for FDA to offer incentives to companies who consistently rate higher than competitors.

This policy supersedes ASHP policy 0814.

1819
INTRAVENOUS FLUID MANUFACTURING FACILITIES AS CRITICAL PUBLIC HEALTH INFRASTRUCTURE
Source: Council on Public Policy
To advocate that federal and state governments recognize intravenous fluid and associated supply manufacturing facilities as critical public health infrastructure.

Rationale
In the wake of hurricane Maria’s impact on Puerto Rico in 2017, there has been rising interest in examining drug shortages from a national security perspective. The vulnerability of drug manufacturing on the island of Puerto Rico underscored a need to more closely evaluate the potential impacts of natural disasters on drug manufacturing and the production of critical pharmaceutical supplies. The Department of Homeland Security’s list of key infrastructure includes public health infrastructure. ASHP advocates that public health infrastructure be defined to include manufacturing sites of intravenous fluids and associated supplies (i.e., components needed to administer intravenous fluids), and that those sites be afforded the same protections as other critical infrastructure. Such protections should include an evaluation of manufacturing vulnerabilities such as geographic location, vulnerability of surrounding infrastructure such as roads or ports, and whether the company has developed business continuity plans or redundancies in manufacturing. Entities deemed critical public health infrastructure should be required to make necessary changes to ensure that manufacturing is not at risk for a supply disruption.

1820
MEDICAL DEVICES
Source: Council on Public Policy
To advocate that the Food and Drug Administration (FDA) and manufacturers of drug preparation, drug distribution, and drug administration devices and associated new technologies ensure transparency, clarity, and evidence be provided on the intended use of devices and technologies in all phases of the medication-use process; further,
To advocate that the FDA and device manufacturers ensure compatibility between the intended use of any device and the drugs to be used with that device.

This policy supersedes ASHP policy 9106.

Rationale
The lines between devices, drugs, and technology are blurring as new and innovative technologies combine drugs and devices. Because drugs and medical devices undergo different approval processes, it is important that compatibility between the intended use of any device and the drugs to be used with that device be ensured during the approval process so that unintended and possibly detrimental consequences do not occur. In addition, clinicians require information about the intended use of devices in all phases of the medication-use process in order to make the best-informed decisions about patient care.

1821 ENSURING EFFECTIVENESS, SAFETY, AND ACCESS TO ORPHAN DRUG PRODUCTS
Source: Council on Therapeutics

To encourage continued awareness of, research on, and development of orphan drug products; further,

To advocate for the use of innovative strategies and incentives to expand the breadth of rare diseases addressed by this program; further,

To encourage postmarketing research to support the safe and effective use of orphan drug products for approved and off-label indications; further,

To advocate that health policymakers, payers, and pharmaceutical manufacturers ensure continuity of care and patient access to orphan drug products; further,

To advocate federal review to evaluate whether orphan drug designation is being used inappropriately to receive FDA approval, extend patents, decrease competition, or limit discounts, thereby reducing patient access.

This policy supersedes ASHP policy 1413.

Rationale
The U.S. Orphan Drug Act of 1983 and similar programs in other countries have greatly expanded the number of therapies available to treat rare diseases through the use of financial and other incentives that encourage drug manufacturers to develop medications for limited patient populations. Despite the overall success of orphan drug programs, concerns have been raised about the breadth of drugs approved through these mechanisms. Although there are more than 7,000 designated orphan diseases in the United States, oncology drugs represent
approximately 33 percent of all orphan drug approvals. ASHP believes that there is a significant need to develop a more comprehensive approach to orphan drug development in order to encourage drug manufacturers to expand the breadth of rare conditions treated by these therapies.

Once an orphan drug is approved, it may be used without restrictions, and these therapies are frequently used to treat patients and conditions that were not assessed during pre-approval clinical studies. While this use can spur innovation and lead to advances in the treatment of common diseases, ASHP believes that this use is also associated with the potential for increased patient harm, given the small patient populations and other characteristics common to studies used to support orphan drug approval. Research is necessary to evaluate the safety and effectiveness of these therapies under real-use conditions. In addition to manufacturer-conducted research, ASHP encourages private and public sector research in order to provide sufficient evidence to support off-label use.

ASHP is concerned about the high cost of these therapies, which contributes to increased healthcare costs and potentially decreases patient access, especially among those who are under- or uninsured. Further, some orphan drugs have later been discontinued by the drug manufacturer—an occurrence that often leaves patients with rare conditions without a treatment alternative. It is essential that stakeholders (e.g., health policymakers, payers, and pharmaceutical manufacturers) continue efforts to provide patient access to these therapies, including developing strategies to ensure that the cost of these therapies does not create an unreasonable barrier to patient access.

There are additional challenges regarding patient access to orphan drugs. There is a need for more emphasis on increasing patient access and addressing 340B issues, especially with critical access facilities. Orphan drug development and marketing in the U.S. is concentrated in a few therapeutic areas. Despite the increase in the number of orphan drugs approved by the Food and Drug Administration, the unmet needs of patients with rare diseases provide evidence that the current incentives are not efficiently stimulating orphan drug development. There is need to balance economic incentives to stimulate the development and marketing of orphan drugs without jeopardizing patients’ access to treatment.

1822
RATIONAL USE OF MEDICATIONS
Source: Council on Therapeutics

To promote evidence-based prescribing and deprescribing for indication, efficacy, safety, duration, cost, and suitability for the patient; further,

To advocate that pharmacists lead interprofessional efforts to promote the rational use of medications, including engaging in strategies to monitor, detect, and address patterns of irrational medication use in patient populations.

This policy supersedes ASHP policy 1312.

Rationale
The World Health Organization (WHO) identifies that rational use of medications requires that "patients receive medications appropriate to their clinical needs, in doses that meet their own individual requirements, for an adequate period of time, and at the lowest cost to them and their community." The overuse, underuse, or misuse of medicines results in wastage of scarce resources and widespread health hazards. Examples of irrational use of medicines include use of too many medicines per patient, inappropriate use of antimicrobials, inadequate dosage, overuse of injections when oral formulations would be more appropriate, failure to prescribe in accordance with clinical guidelines, inappropriate self-medication, decreased access to medicines, and nonadherence to dosing regimens. These actions can negatively affect the quality of patient care, raise healthcare costs, and increase the number of adverse reactions and events, and may cause adverse reactions or negative psychosocial effects.

Strategies to address irrational medication use can be characterized as educational, managerial, economic, or regulatory in nature. Furthermore, the WHO advocates 12 key interventions to promote more rational use of medications:

- establishment of a multidisciplinary national body to coordinate policies on medication use;
- use of clinical guidelines;
- development and use of national essential medications list;
- establishment of drug and therapeutics committees in districts and hospitals;
- inclusion of problem-based pharmacotherapy training in undergraduate curricula;
- continuing in-service medical education as a licensure requirement;
- supervision, audit, and feedback;
- use of independent information on medications;
- public education about medications;
- avoidance of perverse financial incentives;
- use of appropriate and enforced regulation; and
- sufficient government expenditure to ensure availability of medications and staff.

These recommendations are echoed by the Joint Commission of Pharmacy Practitioners, whose tenets of the pharmacists’ patient care process include the collection of necessary subjective and objective information about the patient in order to understand the relevant medical/medication history and clinical status of the patient; assessment of information collected and analysis of the clinical effects of the patient’s therapy in the context of the patient’s overall health goals in order to identify and prioritize problems and achieve optimal care; development of an individualized patient-centered care plan, in collaboration with other healthcare professionals and the patient or caregiver that is evidence-based and cost-effective; implementation of the care plan in collaboration with other healthcare professionals and the patient or caregiver; and monitoring and evaluation of the effectiveness of the care plan and modification of the plan in collaboration with other healthcare professionals and the patient or caregiver as needed.
1823
RESPONSIBLE MEDICATION-RELATED CLINICAL TESTING AND MONITORING
Source: Council on Therapeutics

To recognize that overuse of clinical testing leads to unnecessary costs, waste, and patient harm; further,

To encourage pharmacist accountability and engagement in interprofessional efforts to promote the judicious use of clinical testing and monitoring; further,

To promote research that evaluates pharmacists' contributions and identifies opportunities for the appropriate ordering of medication-related procedures and tests; further,

To promote the use of interoperable health information technology services and health information exchanges to decrease unnecessary testing.

Rationale
As the prevalence of collaborative practice grows and as pharmacist care expands into direct patient care services, so too do the responsibilities held by these practitioners. In many institutions, pharmacists' responsibilities now include ordering blood draws as a part of initiating a medication regimen, assessing drug levels, monitoring for adverse effects, or ordering imaging such as ultrasound for evaluating a deep vein thrombosis or an electrocardiogram to evaluate a QTc interval.

Overuse of medical care is a long-recognized problem in clinical medicine, and more spending and treatment do not translate into better patient outcomes and health. The number of articles on overuse nearly doubled from 2014 to 2015, indicating that awareness of overuse is increasing, despite little evidence of improved practice, which may mean that the overuse of diagnostic tests and lab monitoring is leading to patient harm and could outweigh benefits. Healthcare continues to be enthralled by high-technology innovation, including both therapies and tests. Once practice norms are established, clinicians are slow to de-implement services, even those that are found to be potentially dangerous. Reasons for excessive ordering of tests by healthcare providers include defensive behavior, fear, uncertainty, lack of experience, the use of protocols and guidelines, routine clinical practice, inadequate educational feedback, and clinician’s lack of awareness about the cost of examinations. Inappropriate testing causes unnecessary patient discomfort, entails the risk of generating false-positive results, leads to overloading of diagnostic services, wastes valuable healthcare resources, and is associated with other inefficiencies in healthcare delivery, undermining the quality of health services. One strategy for reducing unnecessary testing is use of interoperable health information technology services and health information exchanges.

Choosing Wisely is a national program designed to help raise provider and public awareness and garner support for appropriate test utilization, with the goal of promoting conversations between providers and patients about choosing appropriate care in order to reduce both harm and waste. In 2016, ASHP announced its partnership with the ABIM.
Foundation on the Choosing Wisely campaign, and in 2017 became the first pharmacy organization to [contribute recommendations] to the campaign.

1824
USE OF BIOMARKERS IN CLINICAL PRACTICE

Source: Council on Therapeutics

To promote appropriate, evidence-based use of biomarkers in clinical practice; further,

To encourage research that evaluates the clinical and safety implications of biomarkers in the care of patients and to guide clinical practice; further,

To promote Food and Drug Administration qualified biomarkers in drug development, regulation, and use in clinical practice; further,

To foster the development of timely and readily available resources about biomarkers and their evidence-based application in clinical practice.

Rationale

The National Institutes of Health Biomarkers Definitions Working Group [defined a biomarker] as “a characteristic that is objectively measured and evaluated as an indicator of normal biological processes, pathogenic processes, or pharmacologic responses to a therapeutic intervention.” In comparison to a clinical endpoint, a biomarker is strictly objective and quantifiable, whereas a clinical endpoint reflects the subject’s well-being and health status from the subject’s perspective. As [defined by the FDA], a biomarker is “a defined characteristic that is measured as an indicator of normal biological processes, or responses to an exposure or intervention, including therapeutic interventions.” The FDA classifies biomarkers in the following categories: susceptibility/risk biomarker, diagnostic biomarker, monitoring biomarker, prognostic biomarker, predictive biomarker, pharmacodynamic/response biomarker, and safety biomarker.

Further, the FDA and its Center for Drug Evaluation and Research are involved in regulating biomarkers in drug development, regulation, and use in clinical practice. Under the FDA [Biomarker Qualification Program], researchers can request qualification of a biomarker in the use of drug development. The FDA’s involvement in biomarker qualifications allows for the development of a regulatory process to investigate the safety and efficacy of biomarkers. Innovative and newly discovered biomarkers are investigated or found unexpectedly in clinical research. Recently published articles demonstrate newly discovered biomarkers that potentially show clinical efficacy; however, there is debate about how to conduct further research to establish a biomarker’s clinical efficacy.

This growth in discovery and application of established biomarkers in practice presents several practice issues, including use of recognized biomarkers, collaborating with practitioners concerning newly discovered or rising biomarkers, conducting research on the outcomes of the use of various biomarkers, and integrating use of biomarkers into practice.
1825

**CLINICIAN WELL-BEING AND RESILIENCE**

*Source: Council on Education and Workforce Development*

To affirm that burnout adversely affects an individual’s well-being and healthcare outcomes; further,

To acknowledge that the healthcare workforce encounters unique stressors throughout their education, training, and careers that contribute to burnout; further,

To declare that healthcare workforce well-being and resilience requires shared responsibility among healthcare team members and between individuals and organizations; further,

To encourage individuals to embrace well-being and resilience as a personal responsibility that should be supported by organizational culture; further,

To encourage the development of programs aimed at prevention, recognition, and treatment of burnout, and to support participation in these programs; further,

To encourage education and research on stress, burnout, and well-being; further,

To collaborate with other professions and stakeholders to identify effective preventive and treatment strategies at an individual, organizational, and system level.

*Rationale*

Burnout is a syndrome characterized by a high degree of emotional exhaustion, high depersonalization (e.g., cynicism), and a low sense of personal accomplishment from work due to both internal and external factors. More than half of U.S. physicians show symptoms of burnout, which is nearly twice as high as other U.S. workers, even after controlling for work hours and other factors. Between 2011 and 2014, the prevalence of burnout increased by 9% among physicians while remaining stable in other U.S. workers. The American Foundation for Suicide Prevention reports that 300-400 physicians commit suicide each year, approximately one per day, double that of the general population. Nurses show a similarly high prevalence of burnout and depression. A 2007 study reported that 22-35% of nurses had a high degree of emotional exhaustion. A survey at Duke University Hospital found that 20% of pharmacists were at risk for burnout. And although less is known about other members of the healthcare team, data suggest a similar prevalence of burnout among pharmacy technicians, nurse practitioners, and physician assistants.

Stress in our clinical learning environment can affect all healthcare learners, with negative outcomes ranging from poor well-being to substance abuse to depression, even suicide. In May 2018, a New York City medical student and resident committed suicide within a week of each other. One review estimates that nearly 29% of medical residents suffer from depression or depressive symptoms, well above the 16% estimated prevalence in the general population.
population. One study has shown that pharmacy residents exhibit high levels of perceived stress, especially those who work more than 60 hours per week, and perceived stress is highly correlated to negative effects.

ASHP joined the National Academy of Medicine (NAM) Action Collaborative on Clinician Well-Being and Resilience in 2017. The goals of the Collaborative are to (1) assess and understand the underlying causes of clinician burnout and suicide, and (2) advance evidence-based solutions that reverse the trends in clinician stress, burnout, and suicide. Clinician burnout is a concern because, in addition to clinician suffering, clinician burnout has been associated with increased rates of medical errors, healthcare-associated infection, and patient mortality. Clinician burnout also decreases patient satisfaction and healthcare workforce productivity. Students in the health professions are also susceptible to burnout.

The NAM Action Collaborative Conceptual Model depicts both individual and external factors affecting well-being and resilience and indicates that it requires a combined effort from the individual and the system to address and prevent burnout. Studies suggest that burnout is a problem of the entire healthcare organization as well as individual clinicians, so maintaining clinician well-being and resilience requires a combined effort by the individuals and their employers. Pharmacists, along with other healthcare professionals and administrators, have a role in researching and solving the problem. To be successful, interventional programs must promote prevention, recognition, and treatment of burnout, and healthcare organizations must foster a culture that supports not just participation in these programs but a sense of personal responsibility for developing and maintaining resilience. Providing patient care is meaningful and purposeful work. A healthcare organization with a resilient workforce will provide the best healthcare outcomes.

1826

STUDENT PHARMACIST DRUG TESTING

Source: Council on Education and Workforce Development

To advocate for the use of pre-enrollment, random, and for-cause drug testing throughout pharmacy education and pharmacy practice experiences, based on defined criteria with appropriate testing validation procedures; further,

To encourage colleges of pharmacy to develop policies and processes to identify impaired individuals; further,

To encourage colleges of pharmacy to facilitate access to and promote programs for treatment and to support recovery; further,

To encourage colleges of pharmacy to use validated testing panels that have demonstrated effectiveness detecting commonly misused, abused, or illegally used substances.

Rationale

Persons 18-25 years of age have the highest prevalence of prescription drug misuse among all age groups. Moreover, there is growing evidence that prescription drug misuse has been
increasing among U.S. college students, and it is second to marijuana as the most common form of substance abuse. Pharmacy professionals and students are entrusted with the health, safety, and welfare of patients. They have access to controlled substances and confidential information, and operate in settings that require the exercise of good judgment and ethical behavior. Thus, an assessment of a student pharmacist’s possible impairment, which could diminish his or her capacity to function in such a setting, is imperative to promote the highest level of integrity in healthcare services. ASHP recognizes that drug testing student pharmacists, whose responsibilities may bring them into contact with controlled substances, is an essential element of diversion prevention programs. Pre-enrollment, random, and for-cause drug testing should be performed based on defined criteria, with appropriate testing validation procedures, and have demonstrated effectiveness detecting commonly abused or illegally used substances. In addition, drug testing should be supported by an addiction recovery program, as outlined in the ASHP Statement on the Pharmacist’s Role in Substance Abuse Prevention, Education, and Assistance.

1827
COLLABORATION ON EXPERIENTIAL EDUCATION
Source: Council on Education and Workforce Development

To encourage practitioner contributions to pharmacy education; further,

To encourage pharmacists and pharmacy leaders to recognize their professional responsibility to contribute to the development of new pharmacy practitioners; further,

To promote collaboration of experiential teaching sites with the colleges of pharmacy (nationally or regionally), for the purpose of fostering preceptor development, standardization of experiential rotation schedule dates and evaluation tools, and other related matters; further,

To encourage colleges of pharmacy and health systems to define and develop collaborative organizational relationships that support patient care and advance the missions of both institutions in a mutually beneficial manner.

This policy supersedes ASHP policies 0315 and 0804.

Rationale
As stated in the ASHP Statement on Professionalism, one of the fundamental services of a professional is recruiting, nurturing, and securing new practitioners to that profession’s ideals and mission. Because the principles of institutional pharmacy practice are not emphasized in typical pharmacy curricula, professional socialization is especially important for pharmacists who practice in those settings. The experiential education experience of student pharmacists is a partnership between colleges of pharmacy and the experiential teaching sites. Collaboration between the colleges of pharmacy and experiential training sites on preceptor development, standardized rotation schedule dates, evaluation tools, and other materials helps to assure the best possible experience for student pharmacists, preceptors, and the experiential education
site. In addition, collaboration allows both entities to fulfill their missions by participating in mutually beneficial activities, improving patient outcomes, and helping students and their institutions achieve educational and research objectives.

1828

PROMOTING THE IMAGE OF PHARMACISTS AND PHARMACY TECHNICIANS

Source: Council on Education and Workforce Development

To promote the professional image of pharmacists and pharmacy technicians who work in all settings of health systems to the general public, public policymakers, payers, other healthcare professionals, and healthcare organization decision-makers.

This policy supersedes ASHP policy 0703.

Rationale

The success of ASHP’s advocacy efforts relies on public perception of the pharmacists, student pharmacists, and pharmacy technicians we represent. Promoting the image of pharmacy, which consistently ranks among the most trusted professions, is an ongoing priority for ASHP. In addition, as stated in the ASHP Statement on Professionalism, one of the fundamental services of a professional is recruiting, nurturing, and securing new practitioners to that profession’s ideals and mission. The recruitment of pharmacists and pharmacy technicians begins in high school or even earlier, when students are exploring potential careers. ASHP is committed to highlighting opportunities for pharmacy careers in all health-system settings to maintain a pool of quality candidates for those careers.

1829

PHARMACY TRAINING MODELS

Source: Council on Education and Workforce Development

To promote pharmacy training models that: (1) provide experiential and residency training in interprofessional patient care; (2) use the knowledge, skills, and abilities of student pharmacists and residents in providing direct patient care; and (3) promote use of innovative and contemporary learning models; further,

To support the assessment of the impact of these pharmacy training models on the quality of learner experiences and patient care outcomes.

This policy supersedes ASHP policy 1316.

Rationale

Pharmacy training models are continually evolving. The ideal training model includes characteristics such as flexibility to be useful in all patient care settings, providing patient care through an interprofessional team, and allowing team members to practice at the top of their licenses. Many healthcare organizations are successfully employing innovative and contemporary training models. One such model is the layered learning approach to
residency and student pharmacist training, in which a pharmacist oversees multiple residents, students, and sometimes generalist pharmacists. Each member of this pharmacy team is integrated into a patient care team, with specific roles and responsibilities, but each also has accountability to the supervising pharmacist. The layered learning model may be more practical in larger institutions, however, because they have more staff, residents, and students than smaller hospitals. ASHP recognizes that it is important to individualize the training program to the practice site and its corresponding practice model, and supports the assessment of the impact of these pharmacy training models on the quality of learner experiences and patient care outcomes.

1830

**ASHP STATEMENT ON ADVOCACY AS A PROFESSIONAL OBLIGATION**

*Source: Council on Public Policy*

To approve the ASHP Statement on Advocacy as a Professional Obligation.

1831

**SAFE AND EFFECTIVE USE OF IV PROMETHAZINE**

*Source: Council on Therapeutics*

To advocate that intravenous promethazine be used only when medically necessary.

*This policy supersedes ASHP policy 1105.*

**Rationale**

In its [2018-2019 Targeted Medication Best Practices for Hospitals](#), the Institute for Safe Medication Practices (ISMP) included a recommendation to eliminate injectable promethazine from hospitals. This recommendation includes removal of injectable promethazine from all areas of the hospital, including the pharmacy; classification of injectable promethazine as a nonstocked, nonformulary medication; implementation of a medical staff-approved automatic therapeutic substitution policy; conversion of all injectable promethazine orders to another antiemetic; removal of injectable promethazine from all computerized medication order screens and from all order sets and protocols. This recommendation was a change from previous ones in which ISMP promoted safe use by raising awareness about risks associated with IV promethazine administration. However, sporadic and significant patient harm continues to occur.

Promethazine is a known vesicant that can cause tissue damage and necrosis when extravasation occurs during intravenous (IV) administration, and it has negative effects on cardiac conduction. Although therapeutic alternatives are available for most indications, the alternative therapies are also not without risk and may not be as effective in some clinical situations. Because promethazine has demonstrated effectiveness for some indications, its use may be warranted in some clinical circumstances, despite its risks. Healthcare organizations should restrict its use to these indications. Processes to limit the potential for patient harm when IV promethazine is used include but are not limited to use of therapeutic alternatives; use
of alternate routes and modalities of administration; restrictions on use; and basing use on a patient-specific evaluation of its risks and benefits, including potential adverse effects.
2017 Policy Positions

1701
ENSURING PATIENT SAFETY AND DATA INTEGRITY DURING CYBER-ATTACKS
Source: Council on Pharmacy Management

To advocate that healthcare organizations include pharmacists in (1) assessing cyber-security systems and procedures for vulnerabilities, (2) implementing cyber-security strategies, and (3) reviewing cyber-security breaches and developing corrective actions; further,

To encourage the development of business continuity plans by pharmacy departments; further,

To advocate that healthcare organizations assess vendor systems to validate the security and integrity of data, including an assessment of the minimum amount of patient health information vendors require to provide services.

Rationale
As use of technology in healthcare has increased, so has the risk of cyber-attacks on this essential infrastructure. The digitization of patient records and the movement to enhance healthcare with technology has increased the risk of cyber-attacks; from 2015 to 2016, there was a 5.2% increase in such attacks against healthcare targets. Moreover, healthcare facilities made up 7.1% of the identified targets in July 2016, a 5.3% increase from the previous month. Maintaining the privacy of health information, in compliance with the Health Insurance Portability and Affordability Act (HIPAA), and ensuring patient safety in the face of cyber-attacks have become essential concerns for every healthcare organization. In July 2016, the U.S. Department of Health and Human Services released guidance on ransomware and HIPAA. Despite this guidance, there remains very little assistance to prevent data breaches or advice on how to respond when an attack occurs. Increased connectivity with vendor systems creates a mutual need to share access to patient information and other vital data, so risk mitigation must be considered at all points of access. Pharmacists and pharmacy departments need to contribute to organizational efforts to prevent and respond to cyber-attacks as well as develop business continuity plans to ensure they can meet patient needs and protect patient privacy in case of such attacks.

1702
REDUCTION OF UNUSED PRESCRIPTION DRUG PRODUCTS
Source: Council on Pharmacy Practice

To recognize that unused prescription drug products contribute to drug misuse, abuse, and diversion; further,

To advocate for research, education, and best practices to ensure appropriate quantities of prescription drug products are prescribed, including but not limited to partial fills or refills;
further,

To advocate that pharmacists take a leadership role in reducing excess quantities of unused prescription drug products.

Rationale
According to the Centers for Disease Control and Prevention (CDC), almost 5% of the U.S. population over 12 years old used prescription pain relievers for nonmedical reasons in 2010, resulting in 15,000 overdose deaths. A major source of diversion is unused prescription drug products, such as those left over after a patient has gained relief from temporary pain. Although prescribers and other healthcare providers have long been aware of the dangers of unused prescription drug products, incentives for overprescribing remain. The desire to minimize office visits, concern about undertreatment of pain, and prohibitions against partial fills and refills of controlled substances contribute to overprescribing.

ASHP recognizes the need for research on best practices to ensure appropriate quantities of drug products are prescribed, which will include study of the effectiveness of partial fills or refills of prescription drug products, among other solutions. ASHP has concerns about quantity and duration limits, because rigid restrictions on treatment options may result in adverse patient outcomes.

Appropriate community return and disposal of excess prescription drug products reduce diversion, accidental poisoning risk, and environmental harm. ASHP advocates for pharmacist leadership in reducing excess quantities of unused prescription drug products through appropriate pain management practices and development and implementation of prescription drug product return and disposal programs.

1703
PHARMACIST’S LEADERSHIP ROLE IN ANTICOAGULATION THERAPY MANAGEMENT
Source: Council on Therapeutics

To advocate that pharmacists provide leadership in caring for patients receiving medications for anticoagulant therapy management; further,

To advocate that pharmacists be responsible for coordinating the individualized care of patients receiving medications for anticoagulation therapy management; further,

To encourage pharmacists who participate in anticoagulation therapy management to educate patients, caregivers, prescribers, and other members of the interprofessional healthcare team about anticoagulant medication uses, drug interactions, adverse effects, the importance of adhering to therapy, access to care, and recommended laboratory testing and other monitoring.

This policy supersedes ASHP policy 0816.
Rationale
As medication experts, pharmacists are well poised to play a key role in implementation, maintenance, monitoring, management of complications, risk assessment, and assurance of continuity of care for patients receiving medications for management of anticoagulation therapy. Inappropriate medication-related management of anticoagulants creates unnecessary preventable harm.

The Joint Commission 2008 National Patient Safety Goals for hospitals include a requirement for reducing the likelihood of harm associated with anticoagulant therapy. Healthcare facilities are instructed to assign leadership for ensuring compliance with this requirement, standardize therapeutic practices and protocols, establish monitoring procedures and a drug–food interaction program, individualize care for each patient receiving these treatments, and provide education on the appropriate management of these patients.

MEDICAL AID IN DYING
Source: Board of Directors
To affirm that a pharmacist’s decision to participate or decline to participate in medical aid in dying for competent, terminally ill patients, where legal, is one of individual conscience; further,

To reaffirm that pharmacists have a right to participate or decline to participate in medical aid in dying without retribution; further,

To take a stance of studied neutrality on legislation that would permit medical aid in dying for competent, terminally ill patients.

This policy supersedes ASHP policy 9915.

Rationale
Medical aid in dying (also called physician-assisted dying, physician-assisted suicide, physician aid in dying, physician-assisted death, hastened death, medically assisted dying, and death with dignity) has been legal in some areas of the U.S. since Oregon passed its Death with Dignity Law in 1995. By 2016, one sixth of U.S. citizens lived in a jurisdiction in which medical aid in dying was available, and more states were contemplating legislation to legalize it. Experience in Oregon and elsewhere demonstrates that pharmacists in those jurisdictions may be confronted with the difficult ethical question of whether to participate in medical aid in dying.

For purposes of this policy position, ASHP adapts a common definition of medical aid in dying: the practice in which a physician provides a prescription for a lethal dose of medication to a terminally ill, competent patient at the patient’s request that the patient can self-administer at a time of his or her choosing to end his or her life. ASHP notes that many of the terms commonly used to describe this practice ignore the patient care and dispensing roles of pharmacists as well as the roles of other healthcare professionals, such as hospice nurses, in providing care for patients requesting medical aid in dying. ASHP recognizes the utility of a term such as “medical aid in dying” that addresses the roles of all healthcare providers involved in or
affected by the practice but acknowledges the term’s ambiguity regarding self-administration of the lethal dose. ASHP therefore explicitly distinguishes medical aid in dying from all forms of euthanasia, which is not the subject of this policy.

ASHP takes a position of studied neutrality on whether pharmacists should participate in medical aid in dying. Studied neutrality has been defined as “the careful or premeditated practice of being neutral in a dispute” and has as its goals “to foster a respectful culture among people of diverse views and to guide action that does not afford material advantage to a [particular] group.” (Johnstone M-J. Organization Position Statements and the Stance of “Studied Neutrality” on Euthanasia in Palliative Care. J Pain Symp Manag. 2012; 44:896-907.) ASHP respects the diversity of views of its members and other pharmacists on medical aid in dying and adopts a position of studied neutrality to promote patient autonomy and access to care and to protect pharmacists’ professional integrity and comity.

The Code of Ethics for Pharmacists states that “a pharmacist promises to help individuals achieve optimum benefit from their medications [and] to be committed to their welfare” and that “a pharmacist promotes the right of self-determination and recognizes individual self-worth by encouraging patients to participate in decisions about their health.” In pharmacist decision-making about participation in medical aid in dying, those principles may clash. Self-determination dictates that patients should be free to exercise their ethical and legal right to choose or decline any legally available treatment. Many healthcare professionals, and their organizations (including the American Medical Association, the American College of Physicians, and the American Nurses Association), question whether death is ever an acceptable therapeutic goal. Others (including the American Academy of Hospice and Palliative Medicine and the American Psychological Association) acknowledge in their statements of neutrality that society may determine that medical aid in dying falls within a spectrum of treatments and withholding of treatments that has as its goal the relief of suffering through a compassionately hastened death, even while recognizing the risks of such a practice.

Pharmacists, like other healthcare professionals, have a right to examine and act on the moral and ethical issues involved in providing care to patients. ASHP policy position 0610, Pharmacist’s Right of Conscience and Patient’s Right of Access to Therapy, outlines the rights and responsibilities of pharmacists and other pharmacy employees who decline to participate in therapies that they find morally, religiously, or ethically troubling, including the right to reasonable accommodation of their right to conscience in a nonpunitive manner. Procedures should be in place to ensure that healthcare organizations can provide mission-compatible care to patients, and that healthcare providers practicing there are not a barrier to the organization’s ability to provide that care. In adopting its position of studied neutrality on pharmacist involvement in medical aid in dying, ASHP recognizes that adopting a position in favor of participation would infringe on the moral and ethical prerogatives of pharmacists. ASHP similarly recognizes that a stance against participation would make the same infringement and in addition present the risk of legal or professional sanction for pharmacists who participate in medical aid in dying where it is legal.

ASHP also takes a position of studied neutrality on whether medical aid in dying should be legally permitted for competent, terminally ill patients. ASHP recognizes that society may interpret the principle of patient autonomy to include the right to therapies that some may find morally, religiously, or ethically troubling, including medical aid in dying. Recognizing as well the
role of healthcare professionals as guardians against practices that would undermine patient autonomy, ASHP advocates that, when permitted, medical aid in dying only be available to competent, terminally ill patients who freely and knowledgeably make that choice.

ASHP joins other healthcare professional organizations in noting that medical aid in dying is inextricably linked with hospice, palliative, and other end-of-life care. ASHP will therefore continue to advocate that patients receive appropriate pharmacist care at the end of life, including pain management (ASHP policy 1722), support in dying (ASHP policy 0307), and hospice and palliative care.

1705
WORKFORCE DIVERSITY
Source: Council on Education and Workforce Development

To affirm that a diverse and inclusive workforce contributes to health equity and health outcomes; further,

To advocate for the development of a workforce whose background, perspectives, and experiences reflect the diverse patients for whom pharmacists provide care.

Rationale
As the U.S. becomes more heterogeneous, the pharmacy workforce should reflect and respond to this increasingly diverse patient base. An inclusive pharmacy workforce is best able to positively impact the health and wellness of patients for whom pharmacists provide care. According to the Institute of Medicine, increasing diversity among healthcare providers is associated with improved access to care for racial and ethnic minority patients, greater patient choice and satisfaction, and better educational experiences for health professions students.1,2 Diversity in the pharmacy workforce includes, but is not limited to, the categories of sexual orientation and gender expression, age, national origin, socioeconomic origin, ethnicity, culture, gender, race, religion, and persons with disabilities.3 A diverse pharmacy workforce will provide the best care for all patients.

1706
ASHP GUIDELINES, STATEMENTS, AND PROFESSIONAL POLICIES AS AN INTEGRAL PART OF THE EDUCATIONAL PROCESS
Source: Council on Education and Workforce Development

To encourage all educators of the pharmacy workforce to use ASHP statements, guidelines, and professional policies as an integral part of education and training.

This policy supersedes ASHP policy 0705.

Rationale
ASHP members create professional policy that reflect best practices and influence the future direction of the profession and patient care. ASHP's professional policies contain varying levels of detail, but all contain guiding principles for the profession. The use of professional policy should be incorporated into all forms of professional education, including pharmacy and technician students, residents, and practitioners and widely used across the pharmacy profession.

1707
PHARMACEUTICAL DISTRIBUTION SYSTEMS

This policy was superseded by ASHP policy 1913.

1708
MOBILE HEALTH TOOLS, CLINICAL APPS, AND ASSOCIATED DEVICES

Source: Council on Pharmacy Management

To advocate that patients, pharmacists, and other healthcare professionals be involved in the selection, approval, and management of mobile health tools, clinical software applications ("clinical apps"), and associated devices used by clinicians and patients for patient care; further,

To foster development of tools and resources to assist pharmacists in designing and assessing processes to ensure safe, accurate, supported, and secure use of mobile health tools, clinical apps, and associated devices; further,

To advocate that decisions regarding the selection, approval, and management of mobile health tools, clinical apps, and associated devices should further the goal of delivering safe and effective patient care and optimizing outcomes; further,

To advocate that mobile health tools, clinical apps, and associated devices that contain health information be interoperable and, if applicable, be structured to allow incorporation of health information into the patient's electronic health record and other essential clinical systems to facilitate optimal health outcomes; further,

To advocate that pharmacists be included in regulatory and other evaluation and approval of mobile health tools, clinical apps, and associated devices that involve medications or medication management.

Rationale
The use of mobile devices (e.g., smartphones, tablets) has become commonplace. Over 68% of adults own a smartphone, and 62% of those use their smartphones to access health information. In addition to these mobile devices, use of remote monitoring devices is also being
rapidly integrated into healthcare. According to a 2015 survey, although only 16% of healthcare professionals currently use mobile health tools in caring for patients, 46% plan to do so in the next five years. With the proliferation of mobile health tools, clinical apps, and associated devices, healthcare organizations need to address the potential risks of application use. Particular concerns include (1) assessing the quality of mobile health tools, clinical apps, and associated devices; (2) standardizing choices and use across the organization; and (3) ensuring the security of data and data storage.

To maximize the effectiveness of mobile health tools, clinical apps, and associated devices, they must be selected, approved, and managed with the goal of improving care and with input from representatives of all affected parties, including patients, physicians, pharmacists, and other healthcare professionals. In addition, their effectiveness is enhanced when they are interoperable (as described in ASHP policy 1302, Interoperability of Patient-Care Technologies) and the data stored within them can be incorporated into the patient’s electronic health record and other essential clinical systems.

Providers and patients currently have little guidance regarding use of these resources or the management of the data they provide. The Food and Drug Administration and other regulatory agencies are just beginning to determine the scope of their oversight. As medication-use experts, pharmacists can contribute to the regulatory evaluation and approval of mobile health tools, clinical apps, and associated devices that involve medications or medication management. In addition, ASHP is committed to fostering development of resources to help pharmacists ensure safe, accurate, supported, and secure use of mobile health tools, clinical apps, and associated devices.

1709
CONTROLLED SUBSTANCE DIVERSION PREVENTION
Source: Council on Pharmacy Management

To encourage healthcare organizations to develop controlled substances diversion prevention programs and policies that delineate the roles, responsibilities, and oversight of all personnel who have access to controlled substances to ensure compliance with applicable laws and scopes of practice; further,

To encourage healthcare organizations to ensure that all healthcare workers are appropriately screened for substance abuse prior to initial employment and surveillance, auditing, and monitoring are conducted on an ongoing basis to support a safe patient-care environment, protect co-workers, and discourage controlled substances diversion.

Rationale
Abuse of controlled prescription drugs (CPDs) is on the rise in the U.S. According to the 2014 National Drug Threat Assessment Summary from the Drug Enforcement Administration (DEA), deaths involving CPDs outnumber those involving heroin and cocaine combined. Additionally, the economic cost of nonmedical use of prescription opioids alone in the U.S. totals more than $53 billion annually. All pharmacies and healthcare institutions that handle controlled substances are required to have storage and distribution systems in place to prevent diversion. Due to the numerous medication access points in most hospital distribution systems, diversion
is sometimes difficult to detect. Theft of controlled substances by healthcare workers remains a serious problem that can lead to patient harm and jeopardize patient safety. Drug addiction among healthcare workers is well documented. One survey suggested that nurses who reported a perception of easier availability of controlled substances were almost twice as likely as others to divert and use a controlled substance. In another survey published in *AJHP*, 19% of pharmacists reported use of a controlled substance without a prescription during the preceding 12 months. Even the most conservative estimates are that 8–12% of physicians will develop a substance abuse problem at some point during their career, although the exact rate of substance abuse among physicians is uncertain.

Pharmacy managers and pharmacists-in-charge have increasing responsibility for ensuring controlled substance management and storage across large healthcare organizations. This expanded responsibility has increased the risk to organizations as acquisitions of physician office practices, clinics, and other nonhospital-based business units continue. To ensure compliance with applicable laws and scopes of practice, ASHP advocates that healthcare organizations develop controlled substances diversion prevention programs and policies to describe the roles, responsibilities, and oversight of all personnel who have access to controlled substances throughout the organization. ASHP supports pre-employment screening and ongoing surveillance, auditing, and monitoring of all healthcare workers to reduce the risk of controlled substances diversion.

### 1710

**REVENUE CYCLE COMPLIANCE AND MANAGEMENT**

*Source: Council on Pharmacy Management*

To encourage pharmacists to serve as leaders in the development and implementation of strategies to optimize medication-related revenue cycle compliance, which includes verification of prior authorization, patient portion of payment, billing, reimbursement, and financial documentation for the healthcare enterprise; further,

To advocate for the development of consistent billing and reimbursement policies and practices by both government and private payers; further,

To advocate that information technology (IT) vendors enhance the capacity and capability of IT systems to support and facilitate medication-related purchasing, billing, and audit functions; further,

To investigate and publish best practices in medication-related revenue cycle compliance and management.

*This policy supersedes ASHP policy 1205.*

**Rationale**

Pharmacy has an increasingly important role in optimizing revenue capture and avoiding revenue erosion resulting from improper billing or inadequate documentation of medication-related charges. Pharmacy needs to be involved in aspects of medication-related billing,
including not just pharmacy drug charges and billing but also contracting and negotiating for carve-outs. Pharmacy leaders need to actively engage senior leadership and collaborate with various departments to ensure organizational success in revenue cycle management.

Recently, organizations have experienced increasing compliance pressures. This pressure comes from many sectors, including Centers for Medicare & Medicaid Services (CMS) programs plus state-specific requirements, third-party payers, and financial intermediaries. These policies impact organizations in two ways: increased requirements before the insurers will pay for a claim, and increased audit pressure to be sure the organizations are billing accurately. The frequency and nature of audits has also been changing. Insurers have increased the use of audits to control costs. Government agencies have also increased the use of audits. CMS has implemented Recovery Audit Contractor (RAC) audits, and the Office of the Inspector General is also auditing organizations. Results of the audits can have significant financial impact on the organization when money needs to be returned based on improper billing or lack of documentation.

Historically, pharmacy departments have great strength in managing supply chain issues. Drug expenditures are typically a significant portion of any hospital’s budget. Pharmacy is a key leader in managing these expenses. However, pharmacy departments are involved in broader revenue cycle management in variable ways. In some organizations, the billing or patient accounting departments handle all billing issues with various degrees of pharmacy involvement. Accurate billing requires integration of the organization’s clinical services, pharmacy, billing, and charge master functions. The required elements for proper billing may reside in several systems. As coverage decisions become more complex, pharmacy expertise is increasingly required in the clinical coverage decisions and information integration in order to be successfully reimbursed for services. For the healthcare enterprise to successfully manage compliance and optimize revenue capture there must be effective collaboration among various departments. Pharmacy knowledge and leadership is increasingly required to ensure organizational success in revenue cycle management.

Each insurer has different requirements for coverage determinations, and coverage decisions have become more complex. More drugs now require prior authorization processes. In some cases, even if the prior authorization process has been used, the charge is denied. Medicare has implemented requirements for self-administered drugs (SADs), and diabetic supplies are now handled under durable medical equipment (DME) requirements, which may require different data elements before a bill is processed. Medicaid requires the National Drug Code (NDC) prior to payment, and billing requirements for Medicare and Medicaid programs are not harmonized. Healthcare Common Procedure Coding System (HCPCS) codes also need to be attached where indicated. It is challenging to keep up with all the changes. International Classification of Disease 10 (ICD-10) codes further complicate required coding. Current IT solutions are inadequate and do not effectively facilitate effective billing. Current systems are often not designed to capture all necessary information required to properly document and bill. Even when necessary data is captured it often resides in different departmental computer systems that are not integrated and designed to share data. There is a need for better IT solutions to facilitate both billing and audits. Greater consistency in billing and reimbursement practices would facilitate greater compliance and enable the development of effective technology solutions to improve billing and reimbursement processes.
Since pharmacy leaders have had variable levels of engagement in revenue cycle management, there is a need for education, tools, and resources related to best practices. Some pharmacy departments have created a business manager position in part to deal with these issues. This position is often not a pharmacist, but a staff member with business training. New roles for pharmacy technicians have also emerged in this area. ASHP and the Section of Pharmacy Practice Managers are committed to developing and sharing best practices and providing education to support pharmacists in optimizing pharmacy’s role in revenue cycle compliance.

1711
READY-TO-ADMINISTER PACKAGING FOR HAZARDOUS DRUG PRODUCTS INTENDED FOR HOME USE
Source: Council on Pharmacy Practice

To advocate that pharmaceutical manufacturers provide hazardous drug products intended for home use in ready-to-administer packaging; further,

To advocate that regulators (e.g., the Food and Drug Administration) have the authority to impose requirements on pharmaceutical manufacturers to provide hazardous drug products intended for home use in ready-to-administer packaging; further,

To advocate that when hazardous drug products intended for home use are not available from manufacturers in ready-to-administer packaging, pharmacies repackage those drug products to minimize the risk of exposure; further,

To advocate that hazardous drug products intended for home use be labeled to warn that special handling is required for safety; further,

To advocate that pharmacists provide education to patients and caregivers regarding safe handling and appropriate disposal of hazardous drug products intended for home use.

Rationale
Home use of oral chemotherapy increases patient convenience and lowers healthcare costs, but it presents unique safety risks. In a hospital or clinic setting, healthcare professionals manage the risks posed by hazardous drugs, defined as any drug identified by at least one of the following six criteria: carcinogenicity, teratogenicity or developmental toxicity, reproductive toxicity in humans, organ toxicity at low doses in humans or animals, genotoxicity, and new drugs that mimic existing hazardous drugs in structure or toxicity (NIOSH Alert: Preventing Occupational Exposure to Antineoplastic and Other Hazardous Drugs in Health Care Settings). In the home environment, however, patients and caregivers must be prepared to fill that role. Ready-to-administer packaging of hazardous drugs minimizes patient, caregiver, and family exposure to hazardous drugs, promotes patient adherence, and enhances safe medication use. Ready-to-administer packaging is defined as packaging that provides the product in a way that requires no manipulation before the patient or caregiver can administer the medication. In contrast, ready-to-use packaging may require a small amount of manipulation (e.g.,
reconstitution). These definitions are consistent with United States Pharmacopeia and Institute for Safe Medication Practices terminology. ASHP advocates that pharmaceutical manufacturers provide hazardous drug products intended for home use in ready-to-administer packaging, and that regulators have the authority to require manufacturers to (1) provide hazardous drug products intended for home use in ready-to-administer packaging, and (2) label hazardous drug products intended for home use to warn that special handling is required to ensure safety. ASHP further advocates that when hazardous drug products intended for home use are not available in ready-to-administer packaging, pharmacies repackage those drug products to minimize exposure risk for caregivers and others in the patient’s household. For example, intravenous drug products should be dispensed in a container designed so the patient or caregiver does not have to puncture a vial; tablets are split or crushed prior to dispensing; compounding of liquid medications is done by the pharmacy, if stability information for the drug product supports advanced compounding and transport; and all liquid medications are dispensed with a dispensing cap that can accommodate attachment of an oral syringe. Finally, ASHP advocates that patients and caregivers be provided education regarding safe handling of hazardous drug products from a qualified healthcare professional, preferably a pharmacist experienced in managing the risks of hazardous drug products.

**1712
EXPIRATION DATING OF PHARMACEUTICAL PRODUCTS**

*Source: Council on Pharmacy Practice*

To support and actively promote the maximal extension of expiration dates of commercially available pharmaceutical products as a means of increasing access to drugs and reducing healthcare costs; further,

To advocate that the Food and Drug Administration implement procedures to encourage pharmaceutical manufacturers to readily update expiration dates, for as long as possible while maintaining drug potency and safety, to reflect current evidence; further,

To advocate that regulators and accreditation agencies recognize authoritative data on extended expiration dates for commercially available pharmaceutical products.

*This policy supersedes ASHP policy 9309.*

**Rationale**

Extending the expiration date of commercially available pharmaceutical products for as long as possible, while maintaining drug potency and safety, reduces healthcare costs and increases access. ASHP encourages pre- and post-marketing research on expiration dates and the use of the most current authoritative data on expiration dates in drug product management. However, the current process for updating expiration dates in drug product labeling presents barriers to timely revision and should be streamlined to allow for timely updates. Until such a process is implemented, regulators and accreditation agencies should permit healthcare organizations to rely on authoritative data when determining appropriate extended expiration dates for commercially available pharmaceutical products.
1713
PARTIAL FILLING OF SCHEDULE II PRESCRIPTIONS
Source: Council on Public Policy

To advocate that state legislatures and boards of pharmacy create consistent laws and rules to allow partial filling of Schedule II drugs; further,

To advocate that public and private entities construct criteria for partial filling to minimize the additional burden on patients, pharmacists, and healthcare organizations; further,

To advocate that pharmacists educate prescribers and patients about options for filling prescriptions for Schedule II drugs, including the risks of overprescribing, while recognizing the patient or caregiver's rights to make their own care and management decisions.

Rationale
The issue of opioid abuse and addiction has been at the forefront of federal and state activity. Increasing addiction rates of patients taking powerful opioids have spurred calls for action to help address this growing problem. The issue has become national in scope and has generated discussion among policymakers and healthcare practitioners alike. In mid-2016, Congress passed the Comprehensive Addiction and Recovery Act of 2016, legislation aimed at curbing opioid abuse and enhancing access to addiction treatment. States have been considering their own legislative initiatives to address what is increasingly described as an epidemic.

One solution proposed by policymakers is to allow pharmacists to dispense only a portion of the quantity of a Schedule II drug prescribed (e.g., 7 days of the prescribed quantity of the drug rather than an entire 30-day supply). Such “partial filling” of Schedule II drug prescriptions reduces the potential of opioid addiction for the patient and the risk of diversion for others. Federal law has been changed to permit partial filling of Schedule II drugs, and Massachusetts and Maine have passed laws to allow for partial filling of Schedule II drugs. ASHP advocates that other state legislatures and boards of pharmacy amend pharmacy practice acts and rules to allow for partial filling of Schedule II drugs, and that such laws and rules be made consistent across states. However, ASHP has concerns about quantity and duration limits applied across the board and not on an as-needed basis. ASHP believes that each patient must be evaluated individually and that policies that allow for partial filling are not indiscriminately applied as an across-the-board mandatory rule. ASHP encourages public and private payers to recognize the additional burden placed on patients and pharmacies by partial filling and to minimize these burdens when possible, including providing appropriate reimbursement for pharmacist activities. ASHP encourages pharmacists to serve as patient advocates by educating prescribers and patients about options for filling prescriptions for Schedule II drugs.

1714
RESTRICTED DRUG DISTRIBUTION
Source: Council on Public Policy

To oppose restricted drug distribution systems that (1) limit patient access to medications; (2) undermine continuity of care; (3) impede population health management; (4)
adversely impact patient outcomes; (5) erode patients' relationships with their healthcare providers, including pharmacists; (6) are not supported by publicly available evidence that they are the least restrictive means to improve patient safety; (7) interfere with the professional practice of healthcare providers; or (8) are created for any reason other than patient safety.

This policy supersedes ASHP policy 0714.

Rationale
Restricted drug distribution systems (RDDSes) that are not created solely for patient safety reasons significantly restrict patient access to medications. These systems were justified as a means to closely monitor patient use of medications that could potentially pose a safety risk. They were never intended to allow drug manufacturers to reduce pharmacists' access to medications through limited distribution networks. Using restricted distribution as a tool to gain marketplace advantage rather than for patient safety undermines the justification for such limited systems. ASHP opposes the use of RDDSes for anything other than patient safety and encourages the FDA or other appropriate authorities to investigate whether RDDSes are being used in a manner inconsistent with the original intent. In addition, RDDSes may compromise continuity of care or interfere with pharmacists' accountability for care to certain patient populations, such as when an RDDS prevents a patient’s pharmacist from obtaining it. Some investigational drugs approved for marketing under an RDDS are no longer available for qualifying patients on admission through the institution, despite the institution having a history of managing the drug while it was investigational. Such circumstances force the patient to seek care elsewhere or require them and their healthcare providers to unnecessarily utilize additional resources to provide care. In addition, healthcare organizations, responsible for the total care of the patient, including maintaining the patient's medical records, may lose the established patient-care relationship when a patient must go to a specialty pharmacy for a drug the healthcare organization cannot access. RDDSes fragment the healthcare delivery system at a time when public and private payers are increasing incentives to integrate patient care.

1715

COLLABORATIVE PRACTICE
Source: Council on Public Policy

To pursue the development of federal and state laws and regulations that authorize pharmacists as providers within collaborative practice; further,

To advocate expansion of federal and state laws and regulations that optimize pharmacists' ability to provide the full range of professional services within their scope of expertise; further,

To advocate for federal and state laws and regulations that would allow pharmacists to prescribe and transmit prescriptions electronically; further,
To acknowledge that as part of these advanced collaborative practices, pharmacists, as active members in team-based care, must be responsible and accountable for medication-related outcomes; further,

To support affiliated state societies in their pursuit of state-level regulations allowing collaborative practice for pharmacists.

This policy supersedes ASHP policy 1217.

**Rationale**

Although many states permit pharmacists to serve as providers in collaborative practice, there is great variability in the authority granted to pharmacists. ASHP supports collaborative practice and advocates its expansion to all states, in a variety of diverse practice settings, and at the highest level of pharmacy practice. As new pharmacy practice models emerge, collaborative practice should be a part of those innovations. One of the common barriers to the highest level of collaborative practice is the prohibition of pharmacists transmitting prescriptions electronically. The expansion of collaborative practice, including electronic transmission of prescriptions, will aid in moving the profession forward to the highest level of team-based practice and will enable pharmacists to practice at the top of their licenses, accountable to the patient and the team for medication-related outcomes.

1716

**GREATER COMPETITION AMONG GENERIC AND BIOSIMILAR MANUFACTURERS**

*Source: Council on Public Policy*

To advocate for legislation and regulations that promote greater competition among generic and biosimilar pharmaceutical manufacturers.

This policy supersedes ASHP policy 0222.

**Rationale**

A healthy market for generic drug products and biosimilars increases patient access to drugs and lowers drug costs. ASHP recognizes several threats to the health of that market and advocates legislative and regulatory solutions: speeding FDA approval of generic drug applications, especially for lifesaving drugs; reducing drug monopolies by incentivizing competition for additional market entrants; targeting exclusivity protections to truly innovative products; and curbing abuse of risk evaluation and mitigation strategies (REMS). In 2015, the FDA faced a backlog of nearly 4,000 generic drug applications, with the approval process taking three years or more. ASHP advocates that the FDA be provided the resources needed to evaluate and approve generic drug applications in a safe and timely manner. ASHP also advocates government and market incentives to increase competition for expensive drugs where no competitors exist and encourage additional market entrants. ASHP has long recognized that agreements between generic and brand-name manufacturers when a product’s market exclusivity is about to expire have the effect of delaying the marketing of competitor products and limiting patient access to affordable generic drugs. ASHP advocates for legislative
and regulatory solutions to limit such agreements, as well as solutions to prevent brand-name manufacturers from extending market exclusivity and preventing market entry by generics by slightly altering the formulation of a product. ASHP further advocates legislation that would prevent frivolous patent infringement litigation by brand-name manufacturers, which is reported to have been initiated with the sole intent to extend market exclusivity. Another solution advocated by ASHP is curbing misuse of REMS, which are reported to have been used to prevent generic manufacturers from accessing drug products. In addition, ASHP advocates for more consumer-accessible information on drug prices, including an annual report on increases in drug prices, which would provide patients and their healthcare providers with the information they need to make drug purchasing choices. Finally, ASHP encourages appropriate federal review of anticompetitive practices by pharmaceutical manufacturers.

1717

**DRUG TESTING**

*Source: Council on Public Policy*

To recognize the use of pre-employment and random or for-cause drug testing during employment based on defined criteria and with appropriate testing validation procedures; further,

To support employer-sponsored drug programs that include a policy and process that promote the recovery of impaired individuals; further,

To advocate that employers use validated testing panels that have demonstrated effectiveness detecting commonly abused or illegally used substances.

*This policy supersedes ASHP policy 9103.*

**Rationale**

Controlled substance diversion and abuse has reached the attention at the highest levels in the U.S., with even the White House weighing in on the crisis. In the past 4-5 years, the Drug Enforcement Administration has levied large fines on chain drugstores, drug wholesalers, and even major hospitals. Pharmacy managers and pharmacists-in-charge have increasing responsibility of ensuring controlled substance management and storage across large healthcare organizations. There is an increased risk to organizations as acquisitions of physician office practices, clinics, and other nonhospital-based business units continue, and many challenges exist for healthcare institutions in managing controlled substances.

ASHP recognizes that drug testing job applicants and employees whose responsibilities may bring them into contact with controlled substances is an essential element of diversion prevention programs. Pre-employment and random or for-cause drug testing should be performed based on defined criteria, with appropriate testing validation procedures, and have demonstrated effectiveness detecting commonly abused or illegally used substances. In addition, drug testing should be supported by an employee addiction recovery program, as outlined in the [ASHP Statement on the Pharmacist’s Role in Substance Abuse Prevention, Education, and Assistance](#).
1718
THERAPEUTIC AND PSYCHOSOCIAL CONSIDERATIONS OF TRANSGENDER PATIENTS
Source: Council on Therapeutics

To support medication and disease management of transgender patients as a part of care unique to this population; further,

To advocate that transgender patients have access to pharmacist care to ensure safe and effective medication use; further,

To promote research on, education about, and development and implementation of therapeutic and biopsychosocial best practices in the care of transgender patients; further,

To encourage structured documentation of both a patient’s birth sex and self-identified gender in electronic health records.

Rationale
The transgender population is a small population that has unique healthcare and biopsychosocial needs. There are guidelines to help practitioners caring for the patients identify these needs and recommendations for practitioners to consider.

Patients electing to transition from their birth sex to their self-identified gender may have surgeries and take higher doses of hormones to change their physical appearance to reflect their self-identified sex. These patients have significant requirements for therapeutic drug monitoring, as certain lab values may appear out of normal limits but are clinically appropriate for the transgender patient, and the risk of drug-drug interactions may be higher because medications may be taken at a higher than normal doses. These patients may be more at risk for adverse effects, including thyroid disorders, and may more frequently require anticoagulation and management of diabetes as a result of medication therapy. Other unique needs of these patients include cardiovascular and thrombotic risk assessment, screening for certain types of cancers should they elect to keep their gonadal organs, and other associated primary care screenings associated with their birth sex. Considerations for transgender patients who wish to have children will add the complexity of fertility as well as attention to use of teratogenic medications to their needs. Because of the unique and complex healthcare needs of transgender patients, it is essential that they have adequate access to appropriate care, including pharmacist care. To help ensure appropriate assessment and treatment, patients’ birth sex and self-identified gender should be documented in a structured way in electronic health records. This documentation also helps healthcare providers address another of the unique biopsychosocial needs of transgender patients; like other healthcare providers, pharmacists should address transgender patients by their self-identified gender.

1719
PHARMACIST’S LEADERSHIP ROLE IN GLYCEMIC CONTROL
Source: Council on Therapeutics

To advocate that pharmacists provide leadership in caring for patients receiving medications for management of blood glucose; further,
To advocate that pharmacists be a member of the interprofessional healthcare team that coordinates glycemic management programs; further,

To encourage pharmacists who participate in glycemic management to educate patients, caregivers, prescribers, and other members of the healthcare team about glycemic control medication uses, metrics, drug interactions, adverse effects, lifestyle modifications, the importance of adhering to therapy, access to care, and recommended laboratory testing and other monitoring.

**Rationale**

As medication experts, pharmacists play a key role in implementation, maintenance, monitoring, management of complications, risk assessment, and assurance of continuity of care for patients receiving medications for management of blood glucose. Inappropriate medication-related management of diabetes creates unnecessary, preventable harm. There is a direct relationship between medication administration and harm from inappropriately managed glycemic agents. In 2014, the Accountability Measures Work Group identified the incidence of hypoglycemic and hyperglycemic events and evidence of poorly controlled diabetes (hemoglobin A1C value exceeding 9%) as clinical measures for pharmacist accountability. Given this responsibility, pharmacists need to provide leadership in caring for patients receiving medications for management of blood glucose, including education of patients and members of the interprofessional healthcare team. To enhance their ability to participate in the care of these patients, many pharmacists have elected to become certified diabetes educators. This training strengthens the value of pharmacists and permits them to be more aligned with the benchmarking tools linked with reimbursement models. The unknown adverse effects of sustained hyperglycemia in the inpatient and outpatient settings, as well as during transitions of care, demonstrate a continued need for pharmacist-led research in all settings.

1720

**DRUG DOSING IN CONDITIONS THAT MODIFY PHARMACOKINETICS OR PHARMACODYNAMICS**

*This policy was superseded by ASHP policy 1804.*

1721

**CLINICAL SIGNIFICANCE OF ACCURATE AND TIMELY HEIGHT AND WEIGHT MEASUREMENTS**

*Source: Council on Therapeutics*

To encourage pharmacists to participate in interprofessional efforts to ensure accurate and timely patient height and weight measurements are recorded in the patient medical record to provide safe and effective drug therapy; further,
To encourage drug product manufacturers to conduct and publicly report pharmacokinetic and pharmacodynamic research in pediatric, adult, and geriatric patients at the extremes of weight and weight changes to facilitate safe and effective dosing of drugs in these patient populations, especially for drugs most likely to be affected by weight; further,

To encourage independent research on the clinical significance of extremes of weight and weight changes on drug use, as well as the reporting and dissemination of this information via published literature, patient registries, and other mechanisms; further,

To advocate that clinical decision support systems and other information technologies be structured to facilitate prescribing and dispensing of drugs most likely to be affected by extremes of weight and weight changes.

Rationale
Patients who have clinically significant changes in weight during an admission or between physician visits, or who are at an extreme high or low weight, have a higher risk of medication dosing errors that depend on weight body surface area. Accurate heights and weights in SI units (i.e., kilograms, grams, meters, and centimeters) are an integral part of a physical examination for pharmacists to ensure proper dosing of medications. Certain medications require dosing based on body surface area, and there is a need for healthcare organizations to consistently record patients’ height, as estimation of height or weight can contribute to potential over- or underdosing.

Factors such as clinically significant changes in weight due to fluid overload and subsequent diuresis, patient growth, and weight changes due to changes in caloric consumption complicate the picture of an appropriate weight to record for dosing certain medications. Some healthcare organizations default to a dosing weight that is used for dosing medications alone, while other weight fluctuations recorded on a daily basis are not used to dose medications, whereas other organizations alert pharmacists to a clinically significant change in weight. Leveraging technology to ensure such safeguards are in place is essential, and providing interoperability between the patient’s recorded dosing weight and smart pumps is ideal.

Pharmacists are also seeing an increase in the number of patients at both extremes of weight, and there is a lack of information regarding dosing medications for these populations. ASHP advocates that the Food and Drug Administration (FDA) develop guidance for voluntary drug dosing studies in these populations, as the need for this guidance is supported by the complexity of drug dosing that can vary based on drug and patient characteristics. Drug product manufacturers should be encouraged to complete pharmacokinetic and pharmacodynamic dosing studies, and to publicly report the results, especially for drugs for which significant weight extremes may have clinical impact.

1722
PAIN MANAGEMENT

Source: Council on Therapeutics
To advocate fully informed patient and caregiver participation in pain management decisions as an integral aspect of patient care; further,

To advocate that pharmacists actively participate in the development and implementation of health-system pain management policies and protocols; further,

To support the participation of pharmacists in pain management, which is a multidisciplinary, collaborative process for selecting appropriate drug therapies, educating patients, monitoring patients, and continually assessing outcomes of therapy; further,

To advocate that pharmacists lead efforts to prevent inappropriate use of pain therapies, including engaging in strategies to detect and address patterns of abuse and misuse; further,

To foster the development of educational resources on multimodal pain therapy, substance abuse and prevention of adverse effects; further,

To encourage the education of pharmacists, pharmacy students, and other healthcare providers regarding the principles of pain management and substance abuse that encourage holistic, supportive approaches and reduce stigma surrounding opioid-use disorders.

This policy supersedes ASHP policy 1106.

Rationale
Currently there are over 100 million adults in the United States affected by acute and chronic pain. Pain management requires ongoing assessment and reassessment of analgesia, activities of daily living, and adverse effects. Pharmacists are well poised to fill a key role in appropriate treatment and optimization of severe pain and chronic pain with multimodal treatment strategies. Pain therapies, in particular, have the potential for abuse if not used appropriately. ASHP is cognizant of the delicate balance between undertreatment of pain and barriers to patient access that can occur with the implementation of abuse-prevention strategies. ASHP advocates increased awareness of the abuse and misuse of some pain therapies and encourages pharmacists to take a lead role in identifying and preventing inappropriate use through individual clinician efforts (e.g., prescriber and patient education on the potential for abuse) and system-based approaches (e.g., use of information technology systems to monitor for trends that suggest inappropriate prescribing or patient use) that encourage holistic, supportive care and reduce stigma surrounding opioid-use disorders.

1723
CLINICAL INVESTIGATIONS OF DRUGS USED IN ELDERLY AND PEDIATRIC PATIENTS
Source: Council on Therapeutics

To advocate for increased enrollment and outcomes reporting of pediatric and geriatric patients in clinical trials of medications; further,
To encourage drug product manufacturers to conduct pharmacokinetic and pharmacodynamic research in pediatric and geriatric patients to facilitate safe and effective dosing of medications in these patient populations.

This policy supersedes ASHP policy 0229.

Rationale
Pediatric and geriatric patients are populations in which the pharmacokinetic and pharmacodynamic properties of medications may differ from those typically seen in an adult patient. These differences can dramatically alter the behavior of drugs, producing supra- or subtherapeutic levels, which may result in adverse effects. While there has been legislation that provides incentive for drug manufacturers to study these effects, many drugs already approved by the FDA do not have such information or robust outcomes reporting for these at-risk populations. The need for this guidance is supported by the complexity of drug dosing for these patients, which varies based on drug and patient characteristics. A paucity of research in these patient populations is noted, which is similar to the lack of preapproval studies in obese patients. ASHP also encourages independent clinical and practice-based research to further define clinical use of drugs in the treatment of these patients, as well as clinician reporting of patient experience via published articles and clinical registries.

1724
SAFE AND EFFECTIVE THERAPEUTIC USE OF INVERTEBRATES
Source: Council on Therapeutics

To recognize use of medical invertebrates as an alternative treatment in limited clinical circumstances; further,

To educate pharmacists, patients, and the public about the risks and benefits of medical invertebrates use and about best practices for use; further,

To advocate that pharmacy departments, in cooperation with other departments, provide oversight of medical invertebrates to assure appropriate formulary consideration and safe procurement, storage, control, prescribing, preparation, dispensing, administration, documentation, clinical and regulatory monitoring, and disposal; further,

To encourage independent research and reporting on the therapeutic use of medical invertebrates.

Rationale
Medical invertebrates, including leeches and maggots, are increasingly used in practice, including in treatment of extravasation injury, post-plastic-surgery salvage, relief of vascular congestion, macroglossia, compartment syndrome, pain management, and debridement therapy. The use of medical invertebrates is not without risk. There have been reports of local and systemic infections with use of leeches and transmission of communicable disease if not handled properly, and use may mask coagulopathies. Antimicrobial prophylaxis may be
required, and there are also drug-invertebrate interactions that may impact the effectiveness of invertebrate therapy. There is also limited research on the efficacy of these therapies that lead to varied practice and unsubstantiated claims.

1725

DRUG DOSING IN EXTRACORPOREAL THERAPIES

Source: Council on Therapeutics

To encourage research on the pharmacokinetics and pharmacodynamics of drug dosing in extracorporeal therapies; further,

To support development and use of standardized models of assessment of the pharmacokinetics and pharmacodynamics of drug dosing in extracorporeal therapies; further,

To collaborate with stakeholders in enhancing aggregation of data on the pharmacokinetics and pharmacodynamics of drug dosing in extracorporeal therapies; further,

To encourage the education of the pharmacy workforce and other healthcare providers regarding the basic principles of and drug dosing in extracorporeal therapies.

This policy supersedes ASHP policy 1606.

Rationale

There are few resources and recommendations for drug dosing in patients receiving the varied forms of extracorporeal therapies, including renal replacement therapy, extracorporeal membrane oxygenation (ECMO) support, apheresis, plasmapheresis, molecular adsorbent recirculating system (MARS) support, single pass albumin dialysis (SPAD), fractionated plasma separation and adsorption (PROMETHEUS), therapeutic plasma exchange (TPE), extracorporeal liver assist device (ELAD) support, modular extracorporeal liver (MELS) support, peritoneal dialysis, and use of ventricular assist devices.

Appropriate dosing is very important in optimizing patient outcomes and achieving goals of therapy. Often drug properties are used to make educated guesses on appropriate dosing and are based on estimations of clearance. In the critically ill population, serious infections and renal issues often occur simultaneously. Solute removal has a significant impact on dosing and appropriate dosing. Many patient characteristics and device variables need to be considered when dosing patients receiving these therapies. These factors include flow rate, membrane pore size, volume of distribution, and patient status. Protein binding helps sustain the drug in tissue, and drugs with a large molecular weight may clog the porous membranes.

Research on drug removal by these extracorporeal means is scarce, and ASHP encourages independent clinical and practice-based research to further define clinical use of drugs for patients receiving these modes of treatment as well as clinician reporting of patient experience via published articles and clinical registries. ASHP also encourages education of the pharmacy workforce and other healthcare providers regarding the basic principles of and drug dosing in extracorporeal therapies.
2016 Policy Positions

1601
SAFETY OF INTRANASAL ROUTE AS AN ALTERNATIVE ROUTE OF ADMINISTRATION
Source: Council on Therapeutics

To encourage the development of institutional guidance and advocate for further research on the pharmacokinetic and pharmacodynamic characteristics of drugs not approved for intranasal administration; further,

To foster the development of educational resources on the safety of intranasal administration of drugs not approved for that route.

Rationale

Intranasal administration can be used for systemic drug delivery and is the delivery route of choice in specific circumstances. Intranasal administration is often the route of choice in the emergency department due to access issues, safety concerns, and the characteristics of specific patient populations (e.g., children). Soluble drugs such as naloxone can be converted for intranasal administration without altering the substance simply by use of an aerosolizer. The intranasal route is frequently used to treat pain when oral and intravenous routes are not optimal, and intranasal midazolam is often used for sedation in the pediatric population, although that route of administration is not FDA-approved. Certain rescue medications such as naloxone can also be administered intranasally and may be preferred for intravenous drug users. Vaccines are also commonly administered via the intranasal route.

Because many of these drugs are not approved for intranasal administration, there are varying degrees of evidence for use in specific cases. There is also varying evidence regarding the degree of systemic absorption of intranasally administered drugs that are not formulated for that route. A large number of characteristics may affect systemic distribution from the intranasal route, such as the presence of preservatives and viscosity of the agents. Given the interest in and potential benefits of intranasal administration, further research on the pharmacokinetics and pharmacodynamics of that route is needed.

1602
DRUG PRODUCT SUPPLY CHAIN INTEGRITY
Source: Council on Pharmacy Management

To encourage the Food and Drug Administration (FDA) and relevant state authorities to take the steps necessary to ensure that (1) all drug products entering the supply chain are thoroughly inspected and tested to establish that they have not been adulterated or misbranded and (2) patients will not receive improperly labeled and packaged, deteriorated, outdated, counterfeit, adulterated, or unapproved drug products; further,

To encourage FDA and relevant state authorities to develop and implement regulations to (1) restrict or prohibit licensed drug distributors (drug wholesalers, repackagers, and manufacturers) from purchasing legend drugs from unlicensed entities and (2) ensure accurate
documentation at any point in the distribution chain of the original source of drug products and
chain of custody from the manufacturer to the pharmacy; further,

To advocate for the establishment of meaningful penalties for companies that violate
current good manufacturing practices (cGMPs) intended to ensure the quality, identity,
strength, and purity of their marketed drug product(s) and raw materials; further,

To advocate for improved transparency so that drug product labeling include a readily
available means to retrieve the name and location of the facility that manufactured the specific
lot of the product; further,

To advocate that this readily retrievable manufacturing information be available
prospectively to aid purchasers in determining the quality of a drug product and its raw
materials; further,

To foster increased pharmacist and public awareness of drug product supply chain integrity; 
further,

To urge Congress and state legislatures to provide adequate funding, or authority to impose
user fees, to accomplish these objectives.

This policy supersedes ASHP policy 1503.

Rationale
The aspect of drug product selection that is not transparent from the labeling is its quality. This
information needs to be readily available so those who make the purchasing decision on behalf
of hospitals and health systems can factor quality into the decision. Aspects of manufacture
that affect quality include the production and compliance history of a manufacturer, the
specific name and location of the manufacturing plant, and the source of raw materials. This
information has been useful in responding to a recall, but it is also important as part of the
procurement process. The FDA’s Strategic Plan for Preventing and Mitigating Drug Shortages
recommends that purchasers of medications consider quality as a component of the purchasing
decision. FDA publishes some quality information about manufacturers; however, in
subcontracting and licensing situations, it is not always known who the actual manufacturer is
and which specific plant location produced the product.

Hospitals and health-system pharmacy leaders have years of experience in managing
the demands and challenges of ensuring that drug supply chain safety and integrity is at the
highest level possible. Unfortunately, there are many forces in the marketplace that seek to
divert and introduce illicit products into the supply chain.

ASHP has supported efforts to improve the integrity of the drug product supply chain,
which has included advocacy on track-and-trace legislation, collaboration with the United
States Pharmacopeia (USP) in its efforts on supply chain integrity, leadership in dealing with the
various issues arising from drug shortages, and a voice for patients and pharmacists on needed
change (regulatory and practice-based) with pharmacy’s trading partners to enable pharmacists
to secure legitimate drug products.
On November 27, 2013, the Drug Quality and Security Act (DQSA) was signed into law. Title II of the DQSA, the Drug Supply Chain Security Act (DSCSA) sets forth new definitions and requirements related to drug product tracing. The DSCSA outlines critical steps to build an electronic, interoperable system by November 27, 2023, which will identify and trace certain prescription drug products as they are distributed in the United States. Implementation of this new electronic, interoperable system, over a 10-year period, will enhance FDA’s ability to help protect U.S. consumers by improving detection and removal of potentially dangerous products from the pharmaceutical distribution supply chain.

1603

STEWARDSHIP OF DRUGS WITH POTENTIAL FOR ABUSE

Source: Council on Therapeutics

To advocate for the inclusion of a clinically appropriate indication of use, the intended duration, and the goals of therapy when prescribing drugs with potential for abuse; further,

To encourage pharmacists to engage in interprofessional efforts to promote the appropriate, but judicious, use of drugs with the potential for abuse, including education, monitoring, assessment of clinical progress, and discontinuation of therapy or dose reduction, where appropriate; further,

To advocate that pharmacists lead efforts to prevent inappropriate use of drugs with potential for abuse, including engaging in strategies to detect and address patterns of use in patient populations at increased risk for adverse outcomes; further,

To facilitate the development of best practices for prescription drug monitoring programs and drug take-back disposal programs for drugs with potential for abuse.

Rationale

Drug abuse in the U.S. has reached epidemic proportions. In 2011, 110 people died every day from drug poisonings, and prescription drugs were involved in 41,300 deaths. According to the CDC, almost 5% of the U.S. population over 12 years used opioid pain relievers for non-medical reasons in 2010. The CDC estimates the cost to insurance companies to be 70 billion annually. The Centers for Disease Control and Prevention (CDC) and White House continue to prioritize drug abuse issue as a national concern. SAMHSA has released a toolkit on opioid overdose, and state prescription drug monitoring programs are increasingly sharing information among states. In 2013, ASHP and others successfully advocated for the rescheduling of hydrocodone combination products due to safety concerns. ASHP has also advocated broader access to naloxone for opioid reversal as part of the nation’s collective efforts to reduce harm from drugs of abuse.

Drugs of abuse consist of a variety of classes of medications and are not limited to opioids, however. The Substance Abuse and Mental Health Services Administration (SAMHSA) acknowledges that drugs of abuse include sedatives, stimulants, and antidepressants, in addition to opioids. Despite their risk for abuse, prescription medications for short-term symptomatic reliefs are often refilled well beyond recommended treatment time periods.
Counseling on chronic long-term therapy is important for those prescribed these drugs, which may require well-planned titration schedules for safe and effective discontinuation. Patients may not have sufficient information on discontinuation of therapy and disposal of agents.

Including a clinically appropriate indication of use, the intended duration, and the goals of therapy in the health record when drugs with potential for abuse are prescribed will foster the appropriate but judicious use of those drugs. Pharmacists, as medication-use experts, should engage in efforts to prevent inappropriate use of drugs with potential for abuse by promoting education, monitoring, assessment of clinical progress, and discontinuation of therapy or dose reduction, where appropriate, and should provide leadership in developing strategies to prevent adverse outcomes from drugs with potential for abuse and optimize prescription drug monitoring programs and drug take-back disposal programs for those drugs as well.

1604

APPROPRIATE USE OF ANTIPSYCHOTIC DRUG THERAPIES

Source: Council on Therapeutics

To advocate for the documentation of appropriate indication and goals of therapy to promote the judicious use of antipsychotic drugs and reduce the potential for harm; further,

To support the participation of pharmacists in the management of antipsychotic drug use, which is an interprofessional, collaborative process for selecting appropriate drug therapies, educating patients or their caregivers, monitoring patients, continually assessing outcomes of therapy, and identifying opportunities for discontinuation or dose adjustment; further,

To advocate that pharmacists lead efforts to prevent inappropriate use of antipsychotic drugs, including engaging in strategies to detect and address patterns of use in patient populations at increased risk for adverse outcomes.

Rationale

Antipsychotic drugs are often prescribed and continued in nursing homes after transition from other care settings without appropriate justification. Although there is currently no FDA-approved drug for behavioral and psychological symptoms of dementia (BPSD), antipsychotic drugs are consistently used off-label for BPSD. According to the Agency for Healthcare Research and Quality, there is medium-level evidence to suggest effectiveness of olanzapine, risperidone, and quetiapine to reduce agitation and behavioral disturbances for people with dementia. Some nursing homes are turning away patients with these conditions because of changes to the CMS Five-Star Quality Rating System for nursing homes, which includes two quality measures on antipsychotic drug use. These quality measures exclude patients with schizophrenia, Huntington’s disease, and Tourette syndrome.

Antipsychotic drugs have a black-box warning for increased mortality in the elderly population. In certain patients there is a benefit for use, and these patients may require more intense monitoring and assessment. Some studies suggest a significant increase in cognitive function for Alzheimer’s patients with aggressive behavior (Vigen 2011). Another study (Bonner 2015) looked at rationales for prescribing and found vague, generalized indications such as
anger and agitation, which is not appropriate, according to guidelines. Nonpharmacological interventions are also supported in managing BPSD. These interventions may be more appropriate in the elderly population, despite being time consuming and labor-intensive.

1605
SAFETY OF EPIDURAL STEROID INJECTIONS
Source: Council on Therapeutics
To encourage healthcare providers to 1) inform patients about the significant risks and potential lack of efficacy of epidural steroid injections, 2) request their informed consent, and 3) inform patients of alternative therapies and their risks and benefits; further,

To recommend pharmacist involvement in the medication-use process associated with epidural steroid injections when such injections are medically necessary.

Rationale
Use of epidural steroid injections to treat low back pain is increasing, despite not being a labeled indication and sparse literature confirming the safety and efficacy of the treatment. These drugs, in this route of administration, have narrow therapeutic indices, and there are quality assurance issues related to the compounding of the preparations used in epidural injections. The safety of epidural steroid injections has been referred to in the FDA Safe Use Initiative (SUI), in which 13 stakeholders were involved in assessing evidence of neurological complications of injections. Several recommended practices resulted, including a controversial preference for nonparticulate steroid injections for use in cervical transforaminal injections. In addition to the concerns about particulates in the injections, there are very significant safety concerns due to the proximity of intrathecal, epidural, and subdural spaces and how the injections are administered. Skillful technique is required to appropriately administer these drugs. Radiographic contrast is often used to guide the needle to injection sites. Improper technique can cause vasospasm and stroke, which is not related to particulates in the injection.

In April 2014 the FDA released a drug safety communication stating that rare and serious neurological effects can result from epidural steroid injections. The safety communication noted that “the effectiveness and safety of epidural administration of corticosteroids have not been established, and FDA has not approved corticosteroids for this use” and recommended that healthcare providers “discuss with patients the benefits and risks of epidural corticosteroid injections and other possible treatments.” ASHP concurs with those recommendations and encourages use of an informed consent process in addition to other institutional protocols, including pharmacist involvement in the medication-use process when such injections are medically necessary, to promote the safe use of epidural steroid injections.

1606
DRUG DOSING IN RENAL REPLACEMENT THERAPY

This policy was superseded by ASHP policy 1725.
USE OF METHADONE TO TREAT PAIN
Source: Council on Therapeutics

To acknowledge that methadone has a role in pain management and that its pharmacologic properties present unique risks to patients; further,

To oppose the payer-driven use of methadone as a preferred treatment option for pain; further,

To advocate that pain management experts, payers, and manufacturers collaborate to provide educational programs for healthcare professionals on treating pain with opioids, including the proper place in therapy for methadone; further,

To advocate that all facilities that dispense methadone, including addiction treatment programs, participate in state prescription drug monitoring programs.

Rationale
Over 16,000 people die each year in the U.S. from opioid overdose. Although methadone accounts for only two percent of opioid prescriptions each year, it is estimated to be responsible for over one third of overdose deaths, according to a 2012 Mortality and Morbidity Weekly Report (MMWR) Vital Signs report. The use of methadone to treat pain and its contribution to overdose deaths is an urgent public health concern.

Methadone was approved in 1947 as an analgesic and antitussive, and in 1972 it received approval for use in treating opioid addiction. In 1995, over 100,000 people in the U.S. received addiction treatment with methadone.

There are significant risks associated with the use of methadone for pain management because of its pharmacokinetic and pharmacodynamic properties. Methadone has a long half-life and short duration of analgesic effect. The respiratory effects last longer, and there is also a risk of QT interval prolongation. In 2006, the FDA released a medication safety alert on the dangers of methadone use for the treatment of pain that included a black-box warning and increased the recommended dosing interval from 3 to 8 hours. In 2008, the Drug Enforcement Agency requested manufacturers to restrict distribution of high-dose formulations to addiction treatment programs and hospitals. Federal regulations restrict the dispensing of methadone; for example, dispensing for opioid addiction treatment is limited to programs certified by the Substance Abuse and Mental Health Services Administration (SAMHSA) and for emergency situations to bridge patients to a treatment program.

Despite these dangers, 30 state Medicaid programs include methadone on the preferred drug list for treatment of pain, primarily due to its low cost. The Centers for Disease Control and Prevention (CDC) has recommended that insurance companies and other payers remove methadone from the preferred lists for treating noncancer pain. Several organizations and federal agencies have recommended against the use of methadone as a first-line agent to treat pain, including the FDA, CDC, the American Academy of Pain Medicine (AAPM), and the American Society of Interventional Pain Physicians. In May 2015, the Energy and Commerce Committee of the U.S. Senate held a hearing to assess what the federal government is doing to
combat the opioid abuse epidemic and identified use of methadone for treatment of pain as a concern. ASHP joins AAPM in advocating that pain management experts, payers, and manufacturers collaborate to provide educational programs on best practices for prescribing opioids, including methadone.

1608

THERAPEUTIC INDICATION IN CLINICAL DECISION SUPPORT SYSTEMS

Source: Council on Therapeutics

To advocate that healthcare organizations optimize use of clinical decision support systems by including the appropriate indication for medications.

Rationale

Several well-known studies have demonstrated reductions in wrong-patient errors and adverse events with the inclusion of indication on the prescription order. In 2010, Eguale\(^4\) described the accuracy of indication information in electronic health records (EHRs). Galanter\(^5\) focused on preventing wrong-patient medication errors with the use of indication-based prescribing. Indication-based alerts resulted in an interception rate of 0.25 interceptions per 1000 alerts. One investigator conducted a trial of inpatient indication-based prescribing using computerized provider order entry (CPOE) with medications commonly used off-label.\(^6\) In a 60-day trial documenting indications in the CPOE system for lansoprazole, intravenous immune globulin, and recombinant Factor VII, the accurate diagnosis rates after validation by a clinician were 9, 16, and 24 percent, respectively. In a study in the Joint Commission Journal on Quality and Patient Safety, investigators tracked a total of 140,755 medications filled by pharmacy technicians over a seven-month period in an academic institution. A total of 5,075 (3.6%) contained errors, and 1,059 contained an error that was not detected by the hospital pharmacist. Just over 23 percent of the undetected errors were potential adverse drug events.\(^7\) Addressing these errors can have a large public health impact. Off-label prescription medication use without strong scientific evidence has also been associated with increased rates of adverse drug events, according to an article in JAMA Internal Medicine.\(^8\) The authors suggested that use of the electronic health record (EHR) and proper documentation of therapeutic indication can help improve surveillance and safety and decrease risk.


In several countries, including Canada and Spain, the EHR includes indication as part of comprehensive documentation. ASHP first developed official policy on the importance of pharmacists’ access to indications in 1993. In 1996, the National Coordinating Council for Medication Error Reporting and Prevention recommended including the purpose of prescription orders because of concerns about safety, unless considered inappropriate by the prescribers. In 1999, the Institute for Safe Medication Practices recommended including the purpose of prescribing on all written orders. In 2004, the National Association of Boards of Pharmacy (NABP) approved a resolution encouraging national and state medical associations to support legislative and regulatory efforts to require prescribers to include indications for all oral, written, and electronically transmitted prescriptions. In 2012, the United States Pharmacopeia made amendments to the standards for prescription container labeling to include “purpose-for-use” language. In 2015, the National Council of Prescription Drug Plans drafted language to recommend diagnosis and SNOMED indication be sent with any prescription.

A project funded by the National Institutes of Health (NIH) project in collaboration with the Agency for Healthcare Research and Quality is underway to assess, evaluate, and make recommendations on optimal communication of the purpose of prescribing. The goal of the project is to improve prescribing safety by redesigning CPOE to incorporate the medication indication into the prescription order. ASHP is a primary partner in this initiative, and almost 100 organizations have already joined the effort. Three phased goals are expected from this project. Phase one consists of a series of webinars. Phase two consists of the development of a white paper that outlines and specifies best practices and ideas obtained from the workgroups and webinars. Finally, phase three consists of the creation of simulated models of ideal systems that can reduce harm and increase efficiency. This project will focus on six domains: medication error prevention and mitigation, facilitating patient education, promoting prescribing drugs of choice, enhanced team communication, organizing the medication list for medication reconciliation, and enabling comparative outcomes research.

1609

PHARMACY TECHNICIAN TRAINING AND CERTIFICATION

This policy was superseded by ASHP policy 1912.

1610

CAREER OPPORTUNITIES FOR PHARMACY TECHNICIANS

Source: Council on Education and Workforce Development

To promote pharmacy technicians as valuable contributors to healthcare delivery; further,

To develop and disseminate information about career opportunities that enhances the recruitment and retention of qualified pharmacy technicians; further,

To support pharmacy technician career advancement opportunities, commensurate with training and education; further,
To encourage compensation models for pharmacy technicians that provide a living wage.

This policy supersedes ASHP policy 0211.

Rationale
As the responsibilities of pharmacy technicians expand and their role as a vital member of the healthcare team is recognized, it is imperative that pharmacy technicians be well trained and competent to perform those responsibilities. Pharmacists cannot achieve their goals for quality patient care without the support of competent pharmacy technicians. To support pharmacists, it is important that pharmacy technician positions be viewed as a career option and not just a job. As such, pharmacy technicians should be given opportunities for life-long advancement and should be compensated a living wage to ensure that being a pharmacy technician is a viable career option. (For the purposes of this policy, a living wage is defined as one sufficient to provide the basic things, such as food and shelter, needed to live an acceptable life.9)

The median annual salary of pharmacy technicians in the U.S., $29,320 in 2012, falls short by approximately $5,000 per year of the median annual salaries for other health technologists and technicians.10 Pharmacy technicians do not earn as much as dental hygienists ($71,530) or radiologic technologists ($56,760).11 If a wage and benefits, commensurate with skills and responsibility, were paid to pharmacy technicians, the pharmacy profession could expect a better return on employee investment and reduced turnover rates. Improving wages and benefits would encourage workers to make a career of being a pharmacy technician and reinforce their vital role on the healthcare team.

1611
DEVELOPING LEADERSHIP COMPETENCIES
Source: Council on Education and Workforce Development
To work with healthcare organization leadership to foster opportunities, allocate time, and provide resources for pharmacy practitioners to move into leadership roles; further,

To encourage leaders to seek out and mentor pharmacy practitioners in developing administrative, managerial, and leadership skills; further,

To encourage pharmacy practitioners to obtain the skills necessary to pursue administrative, managerial, and leadership roles; further,

To encourage colleges of pharmacy and ASHP state affiliates to collaborate in fostering student leadership skills through development of co-curricular leadership opportunities, leadership conferences, and other leadership promotion programs; further,

To reaffirm that residency programs should develop leadership skills through mentoring, training, and leadership opportunities; further,

To foster leadership skills for pharmacists to use on a daily basis in their roles as leaders in patient care.

*This policy supersedes ASHP policy 1518.*

**Rationale**

In their 2013 report, White and Enright anticipated a high rate in turnover of pharmacy directors and middle managers over the coming decade. Healthcare organizations must address this ongoing challenge if there are to be a sufficient number of new directors and managers to fill those positions. Factors that may contribute to a shortage of potential new leaders and managers include:

- New graduates frequently accept clinical positions or positions in drug distribution. After a few years, they may have a desire to assume managerial positions in health-system pharmacies, but training programs may not be convenient for them, and they may not have the resources to obtain training.
- Health-system pharmacy management positions do not turnover often. Prospective managers view those positions as unavailable for the near future, so there is little incentive to obtain training to be ready to move into those positions.
- Job satisfaction among pharmacy managers appears low to prospective managers.
- Frequent turnover in organizational administrative positions (above pharmacy) is frustrating to pharmacy directors, because they continually need to inform new administrators about the organization’s medication-use strengths and weaknesses and the pharmacy department’s roles, strategic plans, and priorities for sustaining quality and making improvements. In those turnover circumstances, diligently achieved pharmacy service improvements can sometimes be eroded and reversed. The ensuing frustration can induce pharmacy directors to depart voluntarily from management positions and make those positions unattractive to others.
- Flattening of organizational structures in healthcare organizations has eliminated numerous managerial positions in pharmacies, leaving fewer pharmacists to serve as mentors for prospective managers. Without positive role models, it is difficult for pharmacists to gain good management experience.
- Pharmacy management positions that combine clinical and management responsibilities sometimes allow little time for clinical work.
- Many pharmacists, even those in managerial positions, have no training in personnel administration. Skills such as conflict resolution and negotiation are rarely taught in pharmacy curricula but are very important in leadership positions.
- In some healthcare organizations, managers receive raises predicated on overall organizational or departmental performance. However, the compensation of some staff may be based on individual performance. These differing bases can lead to instances in which the compensation of those supervised is higher than that of their managers.
When that occurs, it can be a disincentive to individuals considering management positions.

Leadership and managerial potential in today’s student pharmacists and new graduates is as high as it has ever been, but more effort is needed to nurture that potential and develop leadership and management skills in practice. Colleges of pharmacy, state associations, residency programs, and practitioners themselves need to foster the development of leadership and management skills. ASHP can help foster leadership competencies at all levels of practice through actions such as providing education about leadership and management roles, developing Web-based resources, and facilitating networking among leaders, managers, and those aspiring to such roles.

Leadership continues to be a critical area for development, as leadership is a necessary competency in the provision of patient care. There are multiple avenues available to pharmacists for leadership development and ASHP should take the lead in fostering this effort.

1612
INTERPROFESSIONAL EDUCATION AND TRAINING
Source: Council on Education and Workforce Development

To support interprofessional education as a component of didactic and experiential education in Doctor of Pharmacy degree programs; further,

To support interprofessional education, mentorship, and professional development for student pharmacists, residents, and pharmacists; further,

To encourage and support pharmacists’ collaboration with other health professionals and healthcare executives in the development of interprofessional, team-based, patient-centered care models; further,

To foster documentation and dissemination of outcomes achieved as a result of interprofessional education of healthcare professionals.

This policy supersedes ASHP policy 1014.

Rationale
Pharmacist involvement in team-based patient care improves medication-use safety and quality and reduces healthcare costs. For patient-care teams to be effective, they must possess unique skills that facilitate effective team-based interactions. Some pharmacists are exposed to team-based care models through interprofessional education and interaction with students of other disciplines when they are student pharmacists. Some colleges of pharmacy have very effective interprofessional didactic courses that include medical, pharmacy, nursing, and other health professional students. Additionally, most experiential rotations involve interaction with other members of the healthcare team and help students of all disciplines learn about the expertise of other team members. However, not all colleges and schools are effective in providing interprofessional education that facilitates team-based patient care. The reasons vary, but may
include differences in teaching philosophies or a lack of access to other health professional schools at the university or campus.

The Hospital Care Collaborative (HCC) has described common principles for team-based care. The HCC principles recognize the knowledge, talent, and professionalism of all team members and support role delineation, collaboration, communication, and the accountability of individual team members and the entire team. The HCC principles note that collaboration of the healthcare team can lead to improved systems and processes that provide care more efficiently and result in better patient outcomes. The HCC states that current undergraduate and postgraduate professional education of team members is inadequate to promote true team functions.

ASHP believes that interprofessional education is important not only for student pharmacists but also throughout one’s professional career. Similarly, it is important for other professionals on the team so that collaboration and synergistic relationships can develop. Failure to establish these collaborative working relationships early in one’s career can result in poor interactions in years to come. A positive working relationship, including interprofessional mentorship, with physicians and nurses is productive, while a bad working relationship can be counterproductive and devastating to all parties, including patients.

1613
CULTURAL COMPETENCY

Source: Council on Education and Workforce Development

To foster the ongoing development of cultural competency within the pharmacy workforce; further,

To educate healthcare providers on the importance of providing culturally congruent care to achieve quality care and patient engagement.

This policy supersedes ASHP policy 1414.

Rationale
The United States is rapidly becoming a more diverse nation. Culture influences a patient’s belief and behavior toward health and illness. Cultural competence can significantly affect clinical outcomes. Research has shown that overlooking cultural beliefs may lead to negative health consequences. According to the National Center for Cultural Competency, there are numerous examples of benefits derived from the impact of cultural competence on quality and effectiveness of care in relation to health outcomes and well-being. Further, pharmacists can contribute to providing “culturally congruent care,” which can be described as “a process of

12 Administration on Aging. Achieving cultural competence. A guidebook for providers of services to older Americans and their families. Available at: http://archive.org/details/achievingcultura00admi (accessed October 17, 2013)
effective interaction between the provider and client levels” of healthcare that encourages provider cultural competence while recognizing that “[p]atients and families bring their own values, perceptions, and expectations to healthcare encounters which also influence the creation or destruction of cultural congruence.” The Report of the ASHP Ad Hoc Committee on Ethnic Diversity and Cultural Competence\(^\text{15}\) and the ASHP Statement on Racial and Ethnic Disparities in Health Care\(^\text{16}\) support ways to raise awareness of the importance of cultural competence in the provision of patient care so that optimal therapeutic outcomes are achieved in diverse populations.

1614

**CONTROLLED SUBSTANCE DIVERSION AND PATIENT ACCESS**

*Source: Council on Pharmacy Management*

To enhance awareness by pharmacy personnel, healthcare providers, and the public of drug diversion and abuse of controlled substances; further,

To advocate that the pharmacy profession lead collaborative efforts to reduce the incidence of controlled substance abuse; further,

To advocate that pharmacists lead collaborative efforts by organizations of healthcare professionals, patient advocacy organizations, and regulatory authorities to develop and promote best practices for preventing drug diversion and appropriately using controlled substances to optimize and ensure patient access and therapeutic outcomes; further,

To advocate that the Drug Enforcement Administration and other regulatory authorities interpret and enforce laws, rules, and regulations to support patient access to appropriate therapies, minimize burdens on pharmacy practice, and provide reasonable safeguards against fraud, misuse, abuse, and diversion of controlled substances; further,

To advocate establishment of programs to support patients and personnel with substance abuse and dependency issues.

*Rationale*

Pharmacy managers and pharmacists-in-charge (PICs) have increasing responsibility for ensuring controlled substance management and storage across large healthcare organizations. This responsibility has increased as acquisition of physician office practices, clinics, and other non-hospital business units continue.

Controlled substance abuse is rising in the United States. According to the Drug Enforcement Administration (DEA) 2014 National Drug Threat Assessment Summary, deaths involving controlled substances outnumber those involving heroin and cocaine combined.

Additionally, the economic cost of nonmedical use of prescription opioids alone in the U.S. totals more than $53 billion annually. All pharmacies and healthcare organizations that handle controlled substances are required to have storage and distribution systems in place that prevent diversion. Due to the numerous medication-access points embedded within hospital distribution systems, diversion can be difficult to detect. Theft of controlled substances by healthcare professionals remains a serious problem that can lead to patient harm and jeopardize patient safety. Drug addiction among healthcare workers is well documented. One survey found that nurses who reported a perception of easier availability of controlled substances were almost twice as likely as others to divert and use a controlled substance. In another survey, 19% of pharmacists reported use of a controlled substance without a prescription during the preceding 12 months. Even the most conservative estimates are that 8–12% of physicians will develop a substance abuse problem at some point during their career, although the exact rate of substance abuse among physicians is uncertain.

Many challenges exist for healthcare institutions in managing controlled substances. New laws and regulations, including DEA quotas and controlled substances monitoring requirements at retail outpatient dispensing facilities, are meant to decrease diversion and illegal activity but are also impacting patients and pharmacists. In addition, the DEA has allowed hospitals and clinics with an onsite pharmacy and status as an authorized collector to maintain collection receptacles onsite and administer mail-back programs for controlled substances, adding another layer of complexity to controlled substance disposal. Pharmacists in healthcare organizations must meet standards and comply with laws and regulations from a variety of sources, including the DEA, The Joint Commission, Det Norske Veritas, other accreditation organizations, and state and federal governments. The ASHP Statement on the Pharmacist’s Role in Substance Abuse Prevention, Education, and Assistance offers detailed suggestions for pharmacists in addressing substance abuse in their institutions and communities.

1615
PROTECTING WORKERS FROM EXPOSURE TO HAZARDOUS DRUGS
Source: Council on Pharmacy Management

To advocate that pharmaceutical manufacturers eliminate surface contamination on packages and vials of hazardous drugs; further,

To inform pharmacists and other personnel of the potential presence of surface contamination on the packages and vials of hazardous drugs; further,

To advocate that the Food and Drug Administration require standardized labeling and package design for hazardous drugs that would alert handlers to the potential presence of surface contamination; further,

To encourage healthcare organizations, wholesalers, and other trading partners in the drug supply chain to adhere to published standards and regulations, such as ASHP guidelines and United States Pharmacopeia Chapter 800, to protect workers from undue exposure to hazardous drugs.
This policy supersedes ASHP policy 0618.

Rationale
The outer surfaces of vials of hazardous drugs have been shown to be contaminated with hazardous substances, and pharmacy and other personnel handling those vials may unknowingly be exposed. ASHP advocates that individuals involved in drug distribution, receiving, and inventory control adhere to safe handling guidelines, including ASHP guidelines and United States Pharmacopeia Chapter 800, to avoid undue exposure to hazardous substances but recognizes the limits of these best practices. Pharmaceutical manufacturers have a responsibility to provide vials that are devoid of surface contamination due to inadequate vial-cleaning procedures, and can reduce contamination by using decontamination equipment and protective sleeves during the manufacturing process.

The purpose of United States Pharmacopeia (USP) Chapter 800 is to establish standards for protecting personnel and the environment when handling hazardous drugs. Each year, approximately 8 million U.S. healthcare workers are potentially exposed to hazardous drugs, according to the Centers for Disease Control and Prevention. USP Chapter 800 includes definitions, processes, and worker responsibilities that enhance understanding of risk and limit exposure. To support workers in protecting their patients, themselves, and the environment, the FDA and manufacturers will need to develop new production and processing standards to mitigate exposures, including labeling and package design that alerts handlers to the possibility of contamination.

1616
PATIENT EXPERIENCE
Source: Council on Pharmacy Management
To encourage pharmacists to evaluate their practice settings for opportunities to improve the experience patients have with healthcare services and with the outcomes of their drug therapy; further,

To educate pharmacists and pharmacy personnel about the relationship between patient experience and outcomes; further,

To develop or adopt tools that will (1) provide a system for monitoring trends in the quality of pharmacy services to patients, (2) increase recognition of the value of pharmacy services, and (3) provide a basis for making improvements in the process and outcomes of pharmacy services in efforts to engage patients and improve their experience; further,

To facilitate a dialogue with and encourage education of patient experience database vendors to include the value of pharmacists and pharmacy services in the patient experience.

This policy supersedes ASHP policy 0104.

Rationale
A major component of quality of healthcare is patient satisfaction (often referred to as “the
patient experience”), which is critical to how well patients respond and adhere to healthcare. Research has identified a clear link between patient outcomes and a positive patient experience. Additionally, the patient experience is a key determinant of quality of care and an important component of pay-for-performance metrics. Pharmacy leaders need to continually assess how pharmacists and pharmacy services support an improved patient experience with their care across the continuum of practice sites, including how pharmacists contribute to team-based care.

1617
AUTOMATED PREPARATION AND DISPENSING TECHNOLOGY FOR STERILE PREPARATIONS

This policy was superseded by ASHP policy 1903.

1618
INTEGRATED APPROACH FOR THE PHARMACY ENTERPRISE

Source: Council on Pharmacy Practice

To advocate that pharmacy department leaders promote an integrated approach for all pharmacy personnel involved in the medication-use process; further,

To advocate a high level of coordination of all components of the pharmacy enterprise across the continuum of care for the purpose of optimizing (1) medication-use safety, (2) quality, (3) outcomes, and (4) drug therapy.

This policy supersedes ASHP policy 0619.

Rationale

In November 2004 the Joint Commission of Pharmacy Practitioners adopted a vision for pharmacy practice that states that “pharmacists will be the healthcare professionals responsible for providing patient care that ensures optimal medication therapy outcomes.” At the time, ASHP envisioned the pharmacy department as an integrated entity serving as the nucleus for direct and team-based engagement of all pharmacists who work in the institution in an open feedback loop among various areas that support the overall pharmacy enterprise, including drug-use policy, product acquisition and inventory control, frontline and specialized clinical practice, product preparation and distribution, and medication-use safety and quality.

Support for such an integrated approach is based on recognition that the medication-use process is a tightly linked continuum in which the activities of one area affect other upstream and downstream processes.

In the decade since, the healthcare enterprise has continued its evolution from single hospitals to integrated systems and networks. These systems have become even more complex as they expand into new businesses, such as physician practices and outpatient care sites. As these organizations seek to standardize operations and gain economies of scale, pharmacy leaders have recognized that the evolving pharmacy enterprise is more far-reaching and sophisticated than in the past, and pharmacy leaders at all levels have to manage their pharmacy services in the context of the overall goals and needs of the organization across a
wide array of business units, care settings, and organizations. ASHP continues to believe that the integrated approach will optimize drug therapy (i.e., obtaining the most benefit from the resources invested in drug products, taking into account both the cost of drug products and appropriate use of the products); medication-use safety (i.e., avoiding preventable adverse drug events, including medication errors); patient and economic outcomes, and healthcare quality.

Management of pharmacy services is no longer confined to drug distribution and clinical pharmacy but also includes human resources management, integrity of the electronic health record and related patient-care information, and oversight of various business partners. Pharmacy leaders within these evolving health systems confront many new challenges, ranging from communication among the pharmacy management team, decisions on pharmacy infrastructure purchases and contracting, identification of critical services and standardization, succession planning and workforce development, supply chain management, human resource coordination, and strategic planning across diverse healthcare sites within the system. Further challenging health system pharmacy leaders are coordinating pharmacy services across larger geographical regions and organizational boundaries. To cope with these new challenges, pharmacy department leaders need to integrate into a team all pharmacy personnel engaged in the medication-use process of their organizations, including general and specialized clinical practice, drug-use policy, product acquisition and inventory control, product preparation and distribution, and medication-use safety and other quality initiatives.

1619
PREVENTING EXPOSURE TO ALLERGENS
Source: Council on Pharmacy Practice

To advocate for pharmacy participation in the collection, assessment, and documentation of a complete list of allergens pertinent to medication therapy, including food, excipients, medications, devices, and supplies, for the purpose of clinical decision-making; further,

To advocate that vendors of medication-related databases incorporate and maintain information about medication-related allergens and cross-sensitivities; further,

To advocate that pharmacists actively review allergens pertinent to medication therapy and minimize patient and healthcare worker exposure to known allergens, as feasible; further,

To encourage education of pharmacy personnel on medication-related allergens.

Rationale
In 2005, ASHP adopted policy 0501, Mandatory Labeling of the Presence of Latex, and in 2008 adopted policy 0808, Excipients in Drug Products (now ASHP policy 2002). The common theme in these policies is that patients may be exposed to potentially life-threatening allergens in items encountered in the medication-use process (i.e., natural rubber latex, drugs, drug product excipients, devices, and supplies). Pharmacy involvement in collection, assessment, and documentation of a complete list of allergens pertinent to the medication-use process, including food, excipients, medications, devices, and supplies, would assist in clinical decision-
making. Pharmacists should also minimize patient and healthcare worker exposure to known allergens, for example by limiting or banning the use of latex gloves in pharmacies and striving for latex-safe medication formularies. Although allergy information is becoming more readily accessible though the electronic health record and clinical decision support systems, some well-known cross-sensitivities are good candidates to be included in medication-related databases.

1620
PROMOTION OF OFF-LABEL USES
Source: Council on Public Policy
To advocate for authority for the Food and Drug Administration (FDA) to regulate the promotion and dissemination of information about off-label uses of medications and medication-containing devices by manufacturers and their representatives; further,

To advocate that such off-label promotion and marketing be limited to the FDA-regulated dissemination of unbiased, truthful, and scientifically accurate information based on peer-reviewed literature not included in the New Drug Approval process.

This policy supersedes ASHP policy 1120.

Rationale
Congress is considering significant changes in the way drugs are developed, approved, and marketed in the United States. A provision in the House-passed 21st Century Cures bill (H.R. 6) would allow pharmaceutical manufacturers to promote off-label uses of their products to clinicians. This change has raised concerns about the accuracy and sources of such information. Sources of such information, if unreliable, could put patient safety at risk. Despite these concerns about promotion of off-label uses by manufacturers, ASHP has suggested an amendment that would require Food and Drug Administration (FDA) oversight of such promotion and require promotional materials to be unbiased, truthful, scientifically accurate, and based upon peer-reviewed literature not included in the approved labeling of the drug. Materials would therefore require approval by the proper authority (FDA), meet certain requirements, and be truthful and scientifically accurate.

1621
TIMELY BOARD OF PHARMACY LICENSING
Source: Council on Public Policy
To advocate that the National Association of Boards of Pharmacy (NABP) collaborate with boards of pharmacy to streamline the licensure process through standardization and improve the timeliness of application approval; further,

To advocate that NABP collaborate with boards of pharmacy and third-party vendors to streamline the licensure transfer or reciprocity process; further,
To advocate that boards of pharmacy grant licensed pharmacists in good standing temporary licensure, permitting them to engage in practice, while their application for licensure transfer or reciprocity is being processed.

*This policy supersedes ASHP policy 0612.*

**Rationale**

Pharmacists sometimes face challenges from delays in obtaining licensure by transfer or reciprocity when moving their practice from one jurisdiction to another. Such delay may be due to the need for boards to review pharmacists’ licensure records in all jurisdictions in which they are licensed, administer a state pharmacy law exam, complete a criminal background check, and, in some cases, schedule an interview with the board. To address these challenges, boards of pharmacy should allow pharmacists in good standing to immediately practice in a different jurisdiction when they change employment or enter a residency program. Granting pharmacists a temporary license for a period of up to six months while the board completes its review would help meet workforce demands while continuing to safeguard the public health. In some cases, pharmacists who are unable to obtain a license in a timely manner are unable to fully use the skills in which they have been trained. Without a license, the pharmacist may temporarily have to function as a technician or perform other tasks. For pharmacists participating in residency programs outside their jurisdiction of licensure, several months of their residency program can elapse before they receive licensure transfer or reciprocity. Upon completion of a year-long residency program, many residents move to another jurisdiction to practice and have to start the transfer or reciprocity process again.

Members in several states have reporting that in recent years boards of pharmacy have been slow to issue pharmacy licenses. This delay is especially problematic for pharmacy residents from another jurisdiction who rely on boards to grant them a license prior to performing in a clinical capacity. Given that the licensing period can take several months, this delay has presented a problem for pharmacy residents who have a limited timeframe to successfully complete their duties, typically one year. In some cases, state boards are urging residents to obtain a pharmacy technician license; however, this is inappropriate given the expertise and education residents have and the level of practice they’re expected to engage in. Given its national scope, NABP is well-positioned to explore a broad solution to this problem rather than the current, incremental, state-by-state approach.

### 1622

**INCLUSION OF DRUG PRODUCT SHORTAGES IN STATE PRICE-GOUGING LAWS**

*Source: Council on Public Policy*

To urge state attorneys general to consider including shortages of lifesaving drug products within the definition of events that trigger application of state price-gouging laws.

**Rationale**

Drug product shortages can lead to price gouging and trafficking in counterfeit and diverted drug products through gray-market distributors, which can ultimately result in adverse patient outcomes and increased healthcare costs. Strategies, including specific legislation with stiff
penalties for price gouging during drug product shortages, are needed to deter these activities. Thirty-one states currently have price-gouging laws that prohibit price markups on life-sustaining products (e.g., food, water, fuel), usually during a time of disaster, natural or otherwise. In the absence of laws that specifically address price gouging during drug product shortages, ASHP urges state attorneys general to consider including shortages of lifesaving medications within the definitions of disaster or other trigger mechanisms for existing price-gouging laws.

**1623**

**HOME INTRAVENOUS THERAPY**

*Source: Council on Public Policy*

To support the continuation of a home intravenous therapy benefit under federal and private health insurance plans and expansion of the home infusion benefit under Medicare at an appropriate level of reimbursement for pharmacists’ patient care services provided, medications, supplies, and equipment.

*This policy supersedes ASHP policy 0414.*

**Rationale**

The Medicare Modernization Act of 2003 created an outpatient prescription drug benefit for Medicare beneficiaries, Medicare Part D. The new benefit provided prescription drug coverage for Medicare beneficiaries by private health plans and pharmacy benefit managers (PBMs). Although the law requires certain basic coverage packages across the plan continuum, it provides no coverage for services and supplies used in home infusion. The result is that the drug products used in home infusion may be covered, but the supplies (e.g., IV bags, tubing) and services related to providing and administering the drug products are not.

Over the years, efforts have been made to address this gap by moving coverage for the drug products from Part D to Part B, and including supplies and services within that coverage. Initially, this effort resulted in federal legislation to move home infusion coverage from Part D to Part B; however, projected costs to the Medicare program have prevented Congress from passing the legislation. ASHP supports continuation of a home intravenous therapy benefit under federal and private health insurance plans and expanding the home infusion benefit under Medicare to include supplies and services related to providing and administering the therapy.

**1624**

**BAN ON DIRECT-TO-CONSUMER ADVERTISING FOR PRESCRIPTION DRUGS AND MEDICATION-CONTAINING DEVICES**

*Source: Council on Public Policy*

To advocate that Congress ban direct-to-consumer advertising for prescription drugs and medication-containing devices.

*This policy supersedes ASHP policy 1119.*
Direct-to-consumer advertising (DTCA) of prescription drugs and drug-containing implantable medical devices has both positive and negative potential effects. The positive potential effects include broader public awareness and use of therapies, increased patient engagement in their healthcare, and better return on investment in drug and medical device research. These potential benefits need to be weighed against the potential negative effects, however, which include higher drug and device costs, inappropriate prescribing of more costly new drugs or devices without any justifying improvement in patient outcomes, and increased adverse effects. In 2015, the American Medical Association (AMA) adopted a policy calling for a ban on DTCA of prescription drugs and implantable medical devices due to its impacts on drug prices and physician prescribing practices.

Public health researchers have characterized the U.S. experience with direct-to-consumer advertising (DTCA) of prescription drugs since 1997 as “a large and expensive uncontrolled experiment in population health, which to date shows decidedly mixed effects.” Those researchers and others have identified major impacts of DTCA on public health, including an increase in inappropriate prescribing and adverse effects, medicalization of symptoms previously not defined as illness, and increased costs due to inappropriate prescribing.

The impact of DTCA on the prescriber-patient relationship is hard to quantify. In some surveys, physicians have indicated that they fulfilled questionable DTCA-prompted patient requests for prescriptions. A Food and Drug Administration (FDA) survey found that “many physicians felt some pressure to prescribe something” when patients mentioned a drug they learned about through DTCA. Studies of claims data support the conclusion that DTCA led to inappropriate prescribing of COX-2 inhibitors and proton pump inhibitors, and experimental evidence suggests that DTCA could induce clinically questionable prescribing of antidepressants for adjustment disorder.

Although the connection cannot be proved, it has been suggested that the increasing reliance of physician payments on patient satisfaction surveys could present an economic risk to prescribers who deny patient requests. Studies show that DTCA increases prescribing volume and patient demand, and shifts prescribing. DTCA’s effects include overuse of prescription drugs, a shift to less appropriate prescribing, and switches to less cost-effective treatment. In addition, differential effects by patient price sensitivity have been implicated in sustained sales despite a price increase.

Researchers have concluded that the overall effects of DTCA on physician–patient communication are unclear.

18 http://www.fda.gov/Drugs/ResourcesForYou/Consumers/ucm143562.htm
and that the effects of DTCA on improving the quality of care are mixed or lacking in evidence.

The educational value of DTCA has also been questioned. Consumers of DTCA recall more benefit than risk information. Critics of the educational value of DTCA also note that DCTA could exacerbate health disparities due to differing levels of health literacy and lack of incentive to advertise to low-income populations. Researchers have questioned whether purported improvements in adherence, based mainly on negative trials, stand up to scrutiny.

ASHP recognizes that banning a constitutionally protected right to free speech, even commercial speech, must be reinforced by evidence that indicates the banned speech negatively impacts society. In the case of DCTA, those negative impacts, including intrusion on the patient-prescriber relationship and increased healthcare costs, are evident and overwhelming. Given the outsized role prescription drug products have as a cost driver to the healthcare system, the detrimental effects of DCTA, and the limited potential benefits, ASHP has concluded that a ban on DTCA of prescription drugs and drug-containing implantable medical devices is warranted.

1625

TOBACCO, TOBACCO PRODUCTS, AND ELECTRONIC NICOTINE DELIVERY SYSTEMS

Source: Council on Therapeutics

To discourage the use, distribution, and sale of tobacco, tobacco products, and electronic nicotine delivery systems (e.g., vaporizers, vape pens, hookah pens, and electronic cigarettes and pipes) in and by pharmacies; further,

To advocate for tobacco-free environments in hospitals and health systems; further,

To seek, within the bounds of public law and policy, to eliminate the use and distribution of tobacco, tobacco products, and electronic nicotine delivery systems in meeting rooms and corridors at ASHP-sponsored events; further,

To promote the role of pharmacists in tobacco-cessation counseling and medication therapy management; further,

To join with other interested organizations in statements and expressions of opposition to the use of tobacco, tobacco products, and electronic nicotine delivery systems.

This policy supersedes ASHP policy 1224.

Rationale

Pharmacists, as healthcare providers, have long discouraged the use of tobacco and tobacco products as a threat to public health. Electronic nicotine delivery systems (e.g., vaporizers, vape pens, hookah pens, and electronic cigarettes and pipes) are new and unregulated delivery systems for nicotine. The contents of these systems include flavorings, propylene glycol, glycerin, and other unknown ingredients, and the long-term effects of their use have not been studied. Given these uncertainties, pharmacists should discourage their use as well.
Further, pharmacists have a role in recommending and managing drug therapy to support cessation of nicotine-containing products, including tobacco and electronic nicotine delivery systems, as described in the ASHP Therapeutic Position Statement on Cessation of Tobacco Use. Newer therapies, including varenicline, are associated with more and evolving safety risks when compared to nicotine replacement therapies. Given the complexity of drug therapy, pharmacists should play a central role in ensuring the safe and appropriate use of these therapies.

**1626**

**ASHP STATEMENT ON TELEPHARMACY**

*Source: Section of Pharmacy Informatics and Technology*

To approve the ASHP Statement on Telepharmacy.
1501
PHARMACIST PARTICIPATION IN HEALTH POLICY DEVELOPMENT

Source: Council on Public Policy

To advocate that pharmacists participate with policymakers and stakeholders in the development of health-related policies at the national, state, and community levels; further,

To develop tools and resources to assist pharmacists in fully participating in health policy development at all levels.

Rationale

Health policy developed at the federal, state, and local levels increasingly impacts medication use, particularly as payment and delivery models require the interprofessional healthcare team to collaboratively deliver care to meet quality and outcomes measures. The perspective of pharmacists practicing in hospital and ambulatory care settings is essential to the development of health policy. At the federal level, policy development includes drug development, distribution, and control; coverage for medication therapy; interoperability of health information; and all aspects of patient safety. Those federal issues also exist at the state and local level, but also include the full range of scope of practice issues.

The absence of hospital and ambulatory care pharmacist input into health policy development leads to suboptimal public policy, inefficient use of resources (public and private), and the potential for suboptimal patient care at the individual patient level and with specific patient populations. Furthermore, poorly developed public policy results in pharmacists being unable to practice at the top of their licenses.

This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1502
PHARMACIST RECOGNITION AS A HEALTHCARE PROVIDER

Source: Council on Public Policy

To advocate for changes in federal (e.g., Social Security Act), state, and third-party payment programs to define pharmacists as healthcare providers; further,

To affirm that pharmacists, as medication-use experts, provide safe, accessible, high-quality care that is cost effective, resulting in improved patient outcomes; further,

To recognize that pharmacists, as healthcare providers, improve access to patient care and bridge existing gaps in healthcare; further,

To collaborate with key stakeholders to describe the covered direct patient-care services provided by pharmacists; further,
To advocate for sustainable compensation and standardized billing processes used by payers for pharmacist services by all available payment programs.

*This policy supersedes ASHP policy 1307.*

**Rationale**
Recognition of pharmacists as healthcare providers is emerging and being codified in state law as well as in current federal legislative proposals (e.g., H.R. 592, S. 314). In some cases this recognition also includes specified compensation through existing payment mechanisms (e.g., federal Medicare Part B or state Medicaid programs). With recognition, pharmacists should be sustainably compensated for their patient-care services by all public and private payers using standardized billing processes.

*This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.*

1503  
**PHARMACEUTICAL PRODUCT AND SUPPLY CHAIN INTEGRITY**

*This policy was superseded by ASHP policy 1602.*

1504  
**PATIENT ADHERENCE PROGRAMS AS PART OF HEALTH INSURANCE COVERAGE**

*Source: Council on Public Policy*

To advocate for the pharmacist's role in patient medication adherence programs that are part of health insurance plans; further,

To advocate those programs that (1) maintain the direct patient pharmacist relationship; (2) are based on the pharmacist's knowledge of the patient's medical history, indication for the prescribed medication, and expected therapeutic outcome; (3) use a communication method desired by the patient; (4) are consistent with federal and state regulations for patient confidentiality; and (5) permit dispensing of partial fills or overfills of prescription medications in order to synchronize medication refills and aid in medication adherence.

*This policy supersedes ASHP policy 0116.*

**Rationale**
Current payment rules for Medicare Part D plans require a prorated cost-sharing rate for prescriptions dispensed with less than a 30-day supply. This is allowed to avoid waste in the event that a prescription is modified in response to an adverse reaction. Aligning or synchronizing a medication to all of a patient’s chronic medications has been proven to improve adherence. Although Medicare has adopted a policy allowing for a daily cost-sharing rate,
payers have not followed suit. ASHP advocates for similar changes in state law and regulation, since such a change would allow for broader synchronization and improved adherence for patients covered by Medicaid and private third-party payers.

This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1505
STATUTORY PROTECTION FOR MEDICATION-ERROR REPORTING
Source: Council on Public Policy

To collaborate with other healthcare providers, professions, and stakeholders to advocate and support state and federal legislative and regulatory initiatives that provide liability protection for the reporting of actual and potential medication errors by individuals and healthcare providers; further,

To provide education on the role that patient safety organizations play in liability protection.

This policy supersedes ASHP policy 0011.

Rationale
Medication-error reporting at the state and federal level has been shown to improve medication-use systems and aid in conducting a root cause analysis of a medication error. Liability protection for such reporting at the federal is necessary to achieve this analysis and improve patient safety. Pharmacists need to be aware of legal protection for error reporting under the federal Patient Safety and Quality Improvement Act of 2005. The Act set up a network of federally sanctioned Patient Safety Organizations (PSOs) that provide protection for healthcare providers, including pharmacy personnel. A PSO is prohibited from identifying individuals or organizations that report and the information used for educational purposes must be de-identified, including contextually as necessary. The Act overrides state protections and supports the collaboration sought among providers who report and work with a PSO.

1506
PREMARKETING COMPARATIVE CLINICAL STUDIES
Source: Council on Public Policy

To advocate that the Food and Drug Administration have the authority to impose a requirement for comparative clinical trials.

This policy supersedes ASHP policy 0514.

Rationale
With the cost of drug development and approval increasing, the need for comparative clinical trials also is rising. Placebo-controlled studies are not always necessary when a product is in the same drug class as an existing drug. More generally, the FDA should be granted the authority to
require comparative clinical studies when appropriate, whether or not a product in the same drug class is already approved.

1507
FUNDING, EXPERTISE, AND OVERSIGHT OF STATE BOARDS OF PHARMACY

Source: Council on Public Policy

To advocate appropriate oversight of pharmacy practice and the pharmaceutical supply chain through coordination and cooperation of state boards of pharmacy and other state and federal agencies whose mission it is to protect the public health; further,

To advocate adequate representation on state boards of pharmacy and related agencies by pharmacists who are knowledgeable about all areas of pharmacy practice (e.g., hospitals, health systems, clinics, and nontraditional settings) to ensure appropriate oversight; further,

To advocate for dedicated funds for the exclusive use by state boards of pharmacy and related agencies including funding for the training of state board of pharmacy inspectors and the implementation of adequate inspection schedules to ensure the effective oversight and regulation of pharmacy practice, the integrity of the pharmaceutical supply chain, and protection of the public; further,

To advocate that inspections be performed only by pharmacists competent about the applicable area of practice.

This policy supersedes ASHP policy 0518.

Rationale

In recent years, the regulatory scope of boards of pharmacy has grown to address new and expanded scopes of practice and healthcare while fulfilling its mission of protecting the public health. In addition, coordination with federal agencies (e.g., FDA, DEA) and related state agencies add to the complexity of a state board’s mission. With this expanded scope and mission comes the need for additional resources, both financial and human. Specific knowledge acquired by pharmacists is essential to the safe regulation of the profession. Thus, inspectors need to have that knowledge and training in order to assure the health and safety of the public.

1508
SUPPORT FOR FDA EXPANDED ACCESS (COMPASSIONATE USE) PROGRAM

Source: Council on Public Policy

To advocate that the Food and Drug Administration (FDA) Expanded Access (Compassionate Use) Program be the sole mechanism for patient access to drugs for which an investigational new drug application (IND) has been filed, in order to preserve the integrity of the drug approval process and assure patient safety; further,

To advocate for broader patient access to such drugs under the FDA Expanded Access Program; further,
To advocate that IND applicants expedite review and release of drugs for patients who qualify for the program; further,

To advocate that the drug therapy be recommended by a physician and reviewed and monitored by a pharmacist to assure safe patient care; further,

To advocate for the patient's right to be informed of the potential benefits and risks via an informed consent process, and the responsibility of an institutional review board to review and approve the informed consent and the drug therapy protocol.

**Rationale**

Patient access to drugs for which an investigational new drug application (IND) has been filed is made available on a limited basis to individual patients under a compassionate-use program regulated by the FDA. With information about clinical trials and drugs under development readily available to patients, there is an increased demand for access to these therapies. In addition, three states have passed laws to permit patients who have exhausted approved drugs and treatment to have access to these potentially lifesaving drugs. Other states may follow suit in the future, and the FDA has begun to respond to this growing patient demand by streamlining its application process for individual patient expanded access. In order to respond to state legislative proposals, ASHP advocates preserving the integrity of drug development through strengthening the evidence-based clinical trial process and expanded patient access.

1509

**APPROVAL OF BIOSIMILAR MEDICATIONS**

*This policy was superseded by ASHP policy 1816.*

1510

**NALOXONE AVAILABILITY**

*This policy was superseded by ASHP policy 2014.*

1511

**COMPLEMENTARY AND ALTERNATIVE MEDICINE IN PATIENT CARE**

*Source: Council on Therapeutics*

To promote awareness of the impacts of complementary and alternative (CAM) products on patient care, particularly drug interactions, medication safety concerns, and the risk of contamination and variability in active ingredient content; further,

To advocate for the documentation of CAM products in the health record to improve patient safety; further,

To advocate for the inclusion of information about CAM products and their characteristics in medication-related databases; further,
To provide education on the impacts of CAM products on patient care in healthcare organizations; further,

To foster the development of up-to-date and readily available resources about CAM products.

*Rationale*

Complementary and alternative medicine (CAM) may be broadly defined to include biologically based practices, such as dietary supplements, proteins, amino acids, and functional foods; energy therapies; manipulative body-based methods; and mind-body medicine. It is estimated that 38% of adults and 12% of children use some form of CAM. In 2007, $15 billion was spent on CAM in the U.S., and the worldwide market for dietary supplements alone is estimated to be $68 billion.

In the *ASHP Statement on the Use of Dietary Supplements*, ASHP expressed its concern that the widespread, indiscriminate use of dietary supplements presents substantial risks to public health and detailed the basis of those concerns. Some dietary supplements are inherently unsafe, to all people or special populations. Lax regulation of dietary supplement manufacturing presents the risk of contamination or adulteration with harmful substances, including prescription medications. Some dietary supplements interact with medications and may therefore compromise, complicate, or delay effective treatment. Some patients, particularly those who cannot afford expensive medication regimens, may substitute ineffective alternatives for well-proven medical therapies. Product content (both active ingredient and excipients) is not standardized, therapeutic goals are vague, and evidence of efficacy and safety is absent or ambiguous. Although the National Center for Complementary and Alternative Medicine (NCCAM) is taking steps to address the gaps in information regarding CAM products, pharmacists (like other healthcare providers) are frustrated in fulfilling their professional responsibility to provide patients with sound advice by the lack of reliable information about the safety and efficacy of CAM products.

Healthcare organizations take varying approaches to addressing CAM use. Some actively counsel patients against CAM use, others take a more integrative approach and accept the practice, and some even have clinics for referrals. There is, however, a gap in information about CAM use in healthcare organizations. A recent survey of 109 children’s hospitals revealed that 44% report having written policies on dietary supplements, with 46% requiring that interactions be documented in the medical record. Another survey of 302 pharmacy directors found that 38% had no policy on dietary supplements. ASHP has long encouraged healthcare organizations to develop an institutional policy regarding the use of dietary supplements that would allow pharmacists and other healthcare practitioners to exercise their professional judgment while balancing patient autonomy and institutional concerns. Such policies should include promoting healthcare practitioner awareness of the potential impacts of CAM use and should encourage documentation of CAM use in the patient’s health record so that pharmacists and other healthcare practitioners have the knowledge and information they need to treat and advise patients.
1512
DEVELOPMENT OF ABUSE-RESISTANT NARCOTICS

This policy was superseded by ASHP policy 2004.

1513
QUALITY PATIENT MEDICATION INFORMATION

This policy was superseded by ASHP policy 2015.

1514
SAFETY AND EFFECTIVENESS OF ETHANOL TREATMENT FOR ALCOHOL WITHDRAWAL SYNDROME

This policy was superseded by ASHP policy 2001.

1515
RESEARCH ON DRUG USE IN OBESE PATIENTS

This policy was superseded by ASHP policy 1920.

1516
CHEMOTHERAPY PARITY

This policy was superseded by ASHP policy 2003.

1517
DOCUMENTATION OF PENICILLIN ALLERGY AS A COMPONENT OF ANTIMICROBIAL STEWARDSHIP

This policy was superseded by ASHP policy 1921.

1518
DEVELOPING LEADERSHIP COMPETENCIES

This policy was superseded by ASHP policy 1611.

1519
PHARMACY TECHNICIAN TRAINING AND CERTIFICATION

This policy was superseded by ASHP policy 1609.
1520

IMPACT OF INSURANCE COVERAGE DESIGN ON PATIENT CARE DECISION

This policy was superseded by ASHP policy 1809.

1521

IDENTIFICATION OF PRESCRIPTION DRUG COVERAGE AND ELIGIBILITY FOR PATIENT ASSISTANCE PROGRAMS

Source: Council on Pharmacy Management

To advocate that pharmacists or pharmacy technicians ensure that the use of patient assistance programs is optimized and documented to promote continuity of care and patient access to needed medications; further,

To advocate that patient assistance programs should incorporate the pharmacist-patient relationship, including evaluation by a pharmacist as part of comprehensive medication management; further,

To support the principle that medications provided through manufacturer patient assistance programs should be stored, packaged, labeled, dispensed, and recorded using systems that ensure the same level of safety as prescription-based programs that incorporate a pharmacist-patient relationship.

This policy supersedes ASHP policy 0603.

Rationale

Ensuring patients’ medication histories are accurate and continuity of medication therapies is a critical role for pharmacists to monitor and document as patients transition through the healthcare system. Additionally, pharmacists have an important role in ensuring patients have means to access their medications, both upon hospital admission and discharge. With the numerous channels patients use to obtain their medications, it has become increasingly difficult to verify this information and in some cases obtain the medications needed to care for a patient.

Patient assistance programs (PAPs) present a unique challenge for healthcare providers. Documentation of the utilization of a PAP by a patient is important information for providers accessing the patient electronic health record, and improving that documentation should be a priority for healthcare providers. Additionally, pharmacists need to provide leadership in facilitating the utilization of PAPs to ensure continuity of care, the patient’s ability to access needed medications when appropriate, and a comprehensive pharmacist-patient relationship.

1522

DISPOSITION OF ILLICIT SUBSTANCES

Source: Council on Pharmacy Management
To advocate that healthcare organizations be required to develop procedures for the disposition of illicit substances brought into a facility that ensure compliance with applicable laws and accreditation standards; further,

To advocate that healthcare organizations be required to include pharmacy leaders in formulating such procedures.

**Rationale**

Hospitals and health systems often treat patients that have in their possession illicit substances (e.g., Schedule I drugs, or other illegal or illegally possessed substances), which requires the facility to make decisions about how to secure the substances, ensure the appropriate chain of custody, and document possession in the patient’s medical record, as well as decide whether to inform law enforcement. Such decisions benefit from the organization’s legal counsel making a determination for the organization, in consultation with pharmacy leaders who can help interpret the pharmacist-in-charge’s legal requirements and related accreditation standards.

This policy was reviewed in 2020 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

### PHARMACIST’S ROLE IN POPULATION HEALTH MANAGEMENT

**Source:** Council on Pharmacy Management

To recognize the importance of medication management in patient-care outcomes and the vital role of pharmacists in population health management; further,

To encourage healthcare organizations to engage pharmacists and pharmacy leaders in identifying appropriate patient cohorts, anticipating their healthcare needs, and implementing the models of care that optimize outcomes for patients and the healthcare organization; further,

To encourage the development of complexity index tools and resources to support the identification of high-risk, high-cost, and other patient cohorts to facilitate patient-care provider panel determinations and workload balancing; further,

To promote collaboration among members of the interprofessional healthcare team to develop meaningful measures of individual patient and population care outcomes; further,

To advocate for education to prepare pharmacists for their role in population health management.

**Rationale**

As hospital and health systems become larger and adjust to new payment models (e.g., readmissions penalties and reduced Medicare payments), the need for health-system and pharmacy leaders to determine the safest, most efficient, and most economical way to care for identified patient populations has become a significant challenge. Pharmacists have an
important role in managing medication therapies for individual patients as well as participating in the development of care models for patient populations with the interprofessional teams they work within. The utilization of “big data” by health systems is a growing domain of research, and it will be important for pharmacists and pharmacy leaders to make use of this information when developing strategic plans and resource allocations. Similar to the workload and productivity issues traditionally facing hospital leaders, the need to stratify total patient populations, anticipate their healthcare resource needs, and then assign the best site and model of care to obtain the ideal return on investment for both the patient and organization has become of paramount importance. The need for identifying the ideal patient panel sizes and the demographics of these panels will be important for patients and pharmacists as pharmacists practice more in the ambulatory care environment. To accomplish these goals, pharmacists will require education to prepare for their role in population health management.

**1524**

**SUPPORT FOR SECOND VICTIMS**

*Source: Council on Pharmacy Practice*

To acknowledge that the patient is the primary victim in any medical error, unanticipated adverse patient event, or patient-related injury; further,

To acknowledge that involvement by healthcare personnel in such events may cause them to become second victims; further,

To recognize that a just culture and a healthy culture of safety embrace a support system for second victims; further,

To encourage healthcare organizations to establish programs to support second victims; further,

To educate healthcare professionals (including those in training), health organization administrators, and regulatory agencies about the second-victim effect and available resources.

**Rationale**

The University of Missouri Health System has defined second victims as “healthcare providers who are involved in an unanticipated adverse patient event, in a medical error and/or a patient-related injury and become victimized in the sense that the provider is traumatized by the event.” Frequently, these individuals feel personally responsible for the patient outcome. Many feel as though they have failed the patient, second-guessing their clinical skills and knowledge base. Individuals involved in a serious adverse patient event may experience the symptoms of post-traumatic stress disorder and may require support to successfully manage the experience.

Healthcare organizations have emphasized establishing a just culture environment to encourage individuals to speak up when they are aware of medication errors. Studies have indicated that many second victims did not feel they received organizational support after these events, however. The Joint Commission, the Institute for Healthcare Improvement, the Institute for Safe Medication Practices (ISMP), and others have advocated for support systems...
for second victims. The Joint Commission Leadership Standards state that leaders will “make support systems available for staff that have been involved in an adverse or sentinel event.” Healthcare organizations will have to tailor these support systems to their needs. Such support systems may, for example, be tiered, with the first tier being unit or department support; the second tier, trained peer support, including patient-safety and risk-management staff; and the third tier, professional counseling support, such as employee assistance programs or social workers. Education of staff on resources available to support the second victim is critical to avoiding adverse impact on the second victim.

1525

STANDARDIZATION OF DOSES
Source: Council on Pharmacy Practice

To recognize that standardization of medication doses reduces medication errors and improves information technology interoperability, operational efficiency, and transitions of care; further,

To encourage development of universal standardized doses for specific patient populations; further,

To encourage healthcare organizations to adopt standardized doses and to promote publication and education about best practices.

Rationale
Standardization and simplification are widely accepted methods for reducing variability in processes with risk for error. Standardization of medication doses reduces waste and improves efficiency. Computer databases could be constructed with standard dosage forms, facilitating information technology interoperability. Simplified instruction for patients and caregivers improves administration in the home as well as patient adherence.

The standardization of liquid doses has been successfully accomplished in hospitals, but standardization of doses is also applicable to parenteral nutrition solutions and other injectable dosage forms. Standardization of doses within a hospital or health system would reduce waste and the potential for errors in those settings. The strict application of pediatric weight-based dosing, for example, leads to a large number of different doses being used, and many of those doses must then be prepackaged dose-by-dose due to limited stability of liquid and injectable dosage forms.

Standardization of doses within organizations would be made easier by the development of universal standardized doses for specific patient populations, which will require substantial research. Additional studies to determine best practices for standardization of medication doses and education of healthcare practitioners are also needed to facilitate broad adoption of this practice.

This policy was reviewed in 2020 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.
1526
PRESCRIPTION DRUG ABUSE

This policy was discontinued in 2018.

1527
PHARMACIST’S ROLE IN URGENT AND EMERGENCY SITUATIONS
Source: Council on Pharmacy Practice

To affirm that pharmacists should participate in planning and providing emergency treatment team services; further,

To advocate that pharmacists participate in decision-making about the medications and supplies used in medical emergencies; further,

To advocate that pharmacists serve in all emergency responses, and that those pharmacists receive appropriate training and maintain appropriate certifications.

Rationale
Pharmacists have a leadership role in many hospitals in planning for emergency treatment team services. ASHP National Survey data show that approximately 40% of hospitals have pharmacist participation in cardiopulmonary resuscitation (CPR) teams. This role includes developing policy on the contents of code carts and other supplies as well as establishing the role of the pharmacist in supporting these services. The literature demonstrates that pharmacists can make significant contributions to CPR and other emergency response teams as medication-use leaders and as participants, and there is evidence that better patient outcomes result when pharmacists participate. Pharmacists participating in this role should receive appropriate training and certification (e.g., Basic Life Support, Advanced Cardiopulmonary Life support, and Pediatric Acute Life Support).

This policy was reviewed in 2020 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

1528
EXCIPIENTS IN DRUG PRODUCTS

This policy was superseded by ASHP policy 2002.

1529
ONLINE PHARMACY AND INTERNET PRESCRIBING
Source: Council on Pharmacy Practice

To support efforts to regulate prescribing and dispensing of medications via the Internet; further,
To support legislation or regulation that requires online pharmacies to list the states in which the pharmacy and pharmacists are licensed, and, if prescribing services are offered, requires that the sites (1) ensure that a legitimate patient-prescriber relationship exists (consistent with professional practice standards) and (2) list the states in which the prescribers are licensed; further,

To support mandatory accreditation of online pharmacies by the National Association of Boards of Pharmacy Verified Internet Pharmacy Practice Sites or Veterinary-Verified Internet Pharmacy Practice Sites; further,

To support appropriate consumer education about the risks and benefits of using online pharmacies; further,

To support the principle that any medication distribution or drug therapy management system must provide timely access to, and interaction with, appropriate professional pharmacist patient-care services.

This policy supersedes ASHP policy 0523.

Rationale
ASHP’s vision to make medication use safe, optimal, and effective includes supporting efforts to protect the public from unscrupulous website operators who illegally provide medications online. Patients are entitled to know whether the healthcare providers prescribing and dispensing their medications are licensed, and in which states they are licensed. ASHP supports legislation and regulations that would require online pharmacies to provide such information. To further guarantee patient safety, ASHP advocates mandatory accreditation of such sites by the National Association of Boards of Pharmacy (NABP) Verified Internet Pharmacy Practice Sites (VIPPS) and Veterinary-Verified Internet Pharmacy Practice Sites (Vet-VIPPS) accreditation programs for online pharmacies to assure the public that the pharmacies are compliant with federal and state regulations and NABP criteria. Education of consumers will be required to ensure that online pharmacies are used wisely, and use of online pharmacies should involve appropriate pharmacist counseling.

1530
STANDARDIZATION OF SMALL-BORE CONNECTORS TO AVOID WRONG-ROUTE ERRORS
Source: Council on Pharmacy Practice

To support the use of medication administration device connectors and fittings that are designed to prevent misconnections and wrong-route errors; further,

To encourage healthcare organizations to prepare for safe transition to use of medication delivery device connectors and adapters that meet International Organization for Standardization standards; further,

To identify and promote the implementation of best practices for preventing wrong-route errors.
This policy supersedes ASHP policy 1018.

Rationale

Interconnectivity among drug delivery devices and their fittings is a significant and preventable cause of serious or fatal wrong-route errors. Connector and tubing design unique to the route of administration that cannot be linked to a device used for a different route is the strongest type of control for these errors.

An international joint working group composed of the International Organization for Standardization (ISO), Association for the Advancement of Medical Instrumentation (AAMI), FDA, manufacturers, clinicians, and other regulators recently initiated development of new ISO connector standards for medical devices for intravascular/hypodermic, limb cuff, enteral, neuraxial, and breathing systems/pressurized medical gas applications. Urethral standards are also planned, but not yet initiated. The new ISO standards are voluntary and intended to facilitate global standardization of medical devices. The FDA has announced that it will only approve or clear an enteral device with a new small-bore connector if it meets the ISO standard or equivalent alternative method. (Small-bore [less than 8.5 mm diameter] connectors are used to link or join devices, accessories, and components for intravascular/hypodermic, neuraxial [epidural, intrathecal, spinal], urinary, enteral, and breathing system/medical gas delivery of medications.) Subsequently, the first ISO standard for enteral device connectors (ANSI/AAMI/ISO 80369-1) has been adopted industrywide. New connectors will be phased in, beginning fourth quarter 2014. The Joint Commission recently published Sentinel Event Alert #53, Managing risk and transition during transition to new ISO tubing connector standards. The alert provides suggested actions from the 2014 Get Connected campaign provided by the Global Enteral Device Supplier Association (GEDSA), as well as updates to the recommendations from the 2006 Sentinel Event Alert #36 on tubing misconnections.

In addition, the following statements were issued from the 2008 Global Conference on the Future of Hospital Pharmacy in Basel, Switzerland:

Pharmacists should ensure that strategies and policies are implemented to prevent wrong route errors, including, for example, labeling of intravenous tubing near insertion site to prevent misconnections, and use of enteral feeding catheters that cannot be connected with intravenous or other parenteral lines.

Oral syringes that are distinctly different from hypodermic syringes should be used to prevent injection of enteral or oral medicines, especially in pediatric patients.

1531

PHARMACIST ROLE IN CAPITAL PUNISHMENT

Source: Council on Pharmacy Practice

To acknowledge that an individual’s opinion about capital punishment is a personal moral decision; further,

To oppose pharmacist participation in capital punishment; further,
To reaffirm that pharmacists have a right to decline to participate in capital punishment without retribution.

This policy supersedes ASHP policy 8410.

**Rationale**

Since 1977, when Oklahoma became the first state to adopt execution by lethal injection, many healthcare professional organizations have adopted policies opposing participation by members of their respective professions in capital punishment. The American Medical Association (AMA), the American Nurses Association (ANA), and the American Pharmacists Association (APhA) are among these groups; however, a wide variety of organizations have spoken out on the issue. The consistent theme of the opposition of those organizations is that the intentional infliction of death is contrary to the mission of healthcare and therefore unethical. ASHP’s previous policy on pharmacist participation in capital punishment, which was adopted in 1984 and has been reaffirmed several times since, emphasized the pharmacist right to conscience when deciding whether to participate in capital punishment.

The role of pharmacists in execution by lethal injection changed substantially after Hospira relocated its thiopental sodium manufacturing to Italy in 2011. The European Union bans the export of thiopental sodium to countries where it may be used in executions, including the U.S. The ban resulted in severe shortages of the drug, which was the cornerstone of the three-drug cocktail used in lethal injections. (At least nine drug manufacturers have followed suit in prohibiting use of their products for lethal injection.) States responded by substituting compounded anesthetic preparations or instituting other drug protocols, which came under criticism after several executions in which prisoners appeared to suffer despite being medicated. These developments increased the role of pharmacists in preparing and/or compounding drugs for execution by lethal injection, which in turn increased the scrutiny of that role both inside and outside the profession.

That increased scrutiny comes at a time when pharmacists are rapidly expanding their roles on the patient care team and are being recognized as patient care providers. This proposed policy developed by the ASHP Council on Pharmacy Practice recognizes that one’s beliefs about capital punishment are a personal, individual decision but opposes pharmacist participation in capital punishment because it is contrary to their role as healthcare providers. Given the ethical questions about pharmacist participation in capital punishment, pharmacists should not be punished for their refusal to participate.

1532

**ASHP STATEMENT ON THE ROLES AND RESPONSIBILITIES OF THE PHARMACY EXECUTIVE**

Source: Council on Pharmacy Management

To approve the ASHP Statement on the Roles and Responsibilities of the Pharmacy Executive.

This statement supersedes a previous version dated June 10, 2008.
1533
ASHP STATEMENT ON THE PHARMACIST’S ROLE IN SUBSTANCE ABUSE PREVENTION, EDUCATION, AND ASSISTANCE
Source: Council on Pharmacy Practice
To approve the ASHP Statement on the Pharmacist’s Role in Substance Abuse Prevention, Education, and Assistance.
This statement supersedes a previous version dated June 2, 2013.

1534
ASHP STATEMENT ON THE PHARMACIST’S ROLE IN CLINICAL INFORMATICS
Source: Section of Pharmacy Informatics and Technology
To approve the ASHP Statement on the Pharmacist’s Role in Clinical Informatics.

1535
NONPROPRIETARY NAMING OF BIOLOGICAL PRODUCTS
Source: Council on Public Policy
To advocate that originator biological products, related biological products, and biosimilar products share the same global nonproprietary name as defined by the United States Adopted Name Council, the World Health Organization Programme on International Nonproprietary Names, and United States Pharmacopeial Convention; further,

To oppose unique nonproprietary naming for originator biological products, related biological products, and biosimilar products.

Rationale
As biosimilar products obtain approval for use in patients in the U.S., discussion continues among stakeholders over what type of naming process should be applied. A number of stakeholder groups have adopted policy regarding biologic and biosimilar naming, including FDA, National Council for Prescription Drug Programs, (NCPDP), United States Pharmacopoeia (USP), United States Adopted Name (USAN) Council, World Health Organization (WHO), American Medical Association (AMA), and other national pharmacy groups.

The recognized authorities for applying standardized principles of drug and biologic naming include the WHO Programme on International Nonproprietary Names (INN), USAN Council, and USP. These authorities have developed a harmonized biosimilar naming approach based on applying a shared nonproprietary name for originator biological products, related biological products, and biosimilar products. Under their authority, these products essentially share the same nonproprietary name (e.g., “filgrastim” for Neupogen, Zarxio, and Granix), but can be individually identified through their unique National Drug Code (NDC), other unique codified identifiers, and trade names. Thus, well-accepted and widely used existing mechanisms for distinguishing individual products obviate the need for deviation from these existing authoritative approaches by adding a prefix or suffix to the nonproprietary name. Other national pharmacy organizations (e.g., American Pharmacists Association [APhA], Academy of Managed Care Pharmacists [AMCP], National Association of Chain Drug Stores [NACDS], and
National Community Pharmacists Association (NCPA) as well as NCPDP support application of the identical nonproprietary name to these products.

FDA has proposed a nonproprietary naming process that deviates from the existing standardized approach that has been applied by international authorities such as INN and USAN. Under FDA’s proposal, a unique, randomly generated suffix composed of four lowercase letters, or a suffix relating to the license holder of the product (which could change over time), would be applied to originator biological products, related biological products, and biosimilar products.

In its proposed rule for the biologics to which this naming method would initially be applied, FDA has recommended changing the official names for biologics with globally adopted INNs and USANs as outlined below.

<table>
<thead>
<tr>
<th>INN/USAN Name</th>
<th>Proposed FDA Name(s)</th>
<th>Former FDA Placeholder Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>filgrastim</td>
<td>filgrastim-bflm</td>
<td>filgrastim-sndz</td>
</tr>
<tr>
<td></td>
<td>filgrastim-vkzt</td>
<td>tbo-filgrastim</td>
</tr>
<tr>
<td></td>
<td>filgrastim-jcwp</td>
<td></td>
</tr>
<tr>
<td>epoetin alfa</td>
<td>epoetin alfa-cgkn</td>
<td></td>
</tr>
<tr>
<td>pegfilgrastim</td>
<td>pegfilgrastim-ljfd</td>
<td></td>
</tr>
<tr>
<td>infliximab</td>
<td>infliximab-hjmt</td>
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</tr>
</tbody>
</table>

These would be just the first name changes that FDA would implement. The proposed plan would then retrospectively change the names of a broad group of existing products to include unique, randomly generated, four-letter suffixes. Such a naming regime would require extensive education and reprogramming present a risk for medication errors.

Although FDA’s proposed naming process differs from the internationally recognized naming processes supported by WHO, USAN, NCPDP, USP, and others, it appears similar to WHO’s current proposal for four-consonant biological qualifiers that can be employed by countries not having other effective means of tracking specific drug products (e.g., with NDCs or other codified identifiers). Thus, it would result in the existence of two different four-letter modifications of the INN for the same product—the one assigned independently by FDA and the one assigned by WHO. For example, under this scenario, FDA would assign the nonproprietary name “epoetin alfa-cgkn” to the product INN would maintain under the long-established nonproprietary name “epoetin alfa,” but the FDA guidance would allow a qualified name such as “epoetin alfa-xktz.”

FDA cites safety concerns and the ability to track these products precisely to the patients receiving them as justifications for the proposed naming standard. However, stakeholders such as NCPDP have recently commented in opposition to FDA’s proposed naming standard, arguing that FDA’s random, no-vowel suffix could create confusion among clinicians and a potential safety issue if unrecognizable names are used.

This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.
1536
APPROPRIATE USE OF TESTOSTERONE

This policy was discontinued in 2020.

1537
ASHP STATEMENT ON THE ROLES OF PHARMACY TECHNICIANS
Source: Section of Inpatient Care Practitioners
To approve the ASHP Statement on the Roles of Pharmacy Technicians.
1401
STANDARDIZATION OF ORAL LIQUID MEDICATION CONCENTRATIONS
Source: Council on Pharmacy Practice
To advocate for the development of nationally standardized drug concentrations for oral
liquid medications; further,

To encourage all health care providers and organizations to standardize concentrations
of oral liquid medications; further,

To promote effective instruction of patients and caregivers on how to properly measure
and administer oral liquid medications.

Rationale
Standardization and simplification are widely accepted methods for reducing variability in
processes with risk for error. Many oral liquid medications are available in more than one
concentration from manufacturers, and unique pharmacy-compounded formulations also result
in a wide variety of concentrations. Standardization at a national level would reduce variability
when patients are discharged and have prescriptions filled at pharmacies in the community.
Standardization of concentrations within a hospital or health system would reduce the
potential for errors in those settings. Standard doses would reduce the potential for error,
reduce waste, and improve efficiency. Improved instruction of patients and caregivers would
improve proper administration in the home, safely delivering the prescribed dosage of
medication.

This policy was reviewed in 2019 by the Council on Pharmacy Practice and by the Board
of Directors and was found to still be appropriate.

1402
SAFE USE OF RADIOPHARMACEUTICALS
Source: Council on Pharmacy Practice
To affirm that radiopharmaceuticals require the same standards for safe medication use
as other medications, including but not limited to standards for procurement, storage and
control, prescribing, preparation, dispensing, administration, documentation, clinical and
regulatory monitoring, disposal, and formulary consideration; further,

To advocate that pharmacy departments, in cooperation with departments of nuclear
medicine, radiology, and radiation safety, provide oversight of radiopharmaceuticals to assure
safe use; further,

To advocate for incorporation of information on radiopharmaceuticals into college of
pharmacy curricula and increased pharmacy continuing education on radiopharmaceuticals.
This policy was reviewed in 2019 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

Rationale
Many hospitals utilize radiopharmaceuticals for diagnostic imaging tests or for treatment. Most hospitals outsource the preparation of injectable and oral radiopharmaceuticals to external suppliers. Because of the unique nature of these drugs and their narrow scope of use, the pharmacy department is often not involved with their acquisition, handling, or disposal. Reports of improper handling, storage, and disposal suggest that these products should have similar oversight as other drug products used in hospitals, and that pharmacists, pharmacy students, and pharmacy technicians require education regarding their safe use.

1403
PHARMACIST’S ROLE ON ETHICS COMMITTEES
Source: Council on Pharmacy Practice

To advocate that pharmacists should be included as members of hospital and health-system ethics committees; further,

To encourage pharmacists to actively seek ethics consultations as appropriate; further,

To encourage pharmacists serving on ethics committees to seek advanced training in health care ethics.

This policy was reviewed in 2019 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

Rationale
Many hospitals have a committee or other process by which they consider ethical decisions related to patient care. Many issues that face these committees involve medications, yet often pharmacists do not serve on the committee or are not directly involved in the decision-making process. The number of ethical issues involving medications is expected to increase, given many new and unique drug products coming into the market. Pharmacist involvement would better inform these committees and consultations. To effectively contribute to decision-making on ethics, pharmacists will require advanced education on the subject.

1404
SAFE USE OF FENTANYL TRANSDERMAL SYSTEM PATCHES

This policy was superseded by ASHP policy 2018.

1405
AUTOMATIC STOP ORDERS
Source: Council on Pharmacy Practice
To advocate that the Centers for Medicare & Medicaid Services (1) remove the requirement in the Hospital Conditions of Participation that all medication orders automatically stop after an arbitrarily assigned period to include other options to protect patients from indefinite, open-ended medication orders, and (2) revise the remainder of the medication management regulations and interpretive guidelines to be consistent with this practice; further,

To affirm that the requirement for automatic stop orders for all medications is a potential source of medication errors and patient harm; further,

To encourage pharmacists to participate in interprofessional efforts to establish standardized methods to assure appropriate duration of therapy.

This policy was reviewed in 2019 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

Rationale
Automatic stop orders on medications are intended to safeguard patients against unnecessary or prolonged drug therapy, yet they also have been shown to cause medication errors when critical therapy is inadvertently and arbitrarily discontinued. The Centers for Medicare & Medicaid Services Hospital Conditions of Participation (CMS COP) continue to require automatic stop orders for all medications, not accounting for shorter lengths of stay and other means of reviewing drug therapy for appropriateness. The CMS COP should be revised to reflect better, more effective approaches to re-evaluating the appropriateness of medications.

1406
FEDERAL AND STATE REGULATION OF COMPOUNDING
Source: Council on Public Policy

To advocate that the applicable compendial standards of the United States Pharmacopeia be included in state and federal laws and regulations that govern compounding by any health professional; further,

To advocate for mandatory state registration of compounding facilities (e.g., pharmacies, physician offices, clinics, ambulatory surgery centers) that provide products for specific patient prescriptions or in anticipation of specific patient prescriptions or medication orders; further,

To advocate for mandatory Food and Drug Administration registration and current good manufacturing practices requirements for outsourcing facilities that compound and sell products without patient-specific prescriptions across state lines; further,

To advocate for improved patient safety and care through education of regulatory inspectors, increased frequency and improved effectiveness of compliance inspections, and enhancing interagency communications; further,
To advocate that state and federal agencies develop standardized definitions and nomenclature relating to sterile and nonsterile compounding, including but not limited to definitions of compounding, manufacturing, repackaging, and relabeling.

This policy was reviewed in 2019 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

Rationale
The practice of compounding has evolved along with the profession of pharmacy. With the advancement of pharmaceutical manufacturing, the preparation of individualized medications based on a prescription or medication order has also evolved. In particular, sterile preparation and related best practices (e.g., ASHP guidelines) and standards of practice (relevant USP chapters) have also evolved. However, cases of contamination, adulteration, and misbranding have persisted, culminating in the meningitis tragedy caused by contaminated sterile preparations compounded by the New England Compounding Center (NECC). That contamination resulted in 64 deaths and over 700 patient cases, as reported by the Centers for Disease Control and Prevention.

The NECC case highlighted the need for accountability and clear regulatory jurisdiction between state boards of pharmacy and the federal Food and Drug Administration. Since 1997, there has been discussion and debate over the proper oversight of compounding. The NECC case demonstrated the real and potential national public health threat posed by the lack of oversight of the practice of compounding. This threat is particularly acute when high-risk sterile products are prepared in large quantities and sold across state lines without adherence to either relevant USP chapters or Food and Drug Administration (FDA) current good manufacturing practices (cGMPs). Over the past 16 years, a series of court decisions in various federal circuits has resulted in a patchwork application of Section 503A of the Federal Food Drug and Cosmetic Act. In addition, a new type of supplier of sterile compounded preparations has emerged to fill a critical need for high-risk sterile preparations for hospitals and health systems. Those health systems are often unable to make the capital and/or human resource investments to prepare these high-risk preparations and seek to use outside suppliers to meet their patients’ needs. In 2013, Congress passed H.R. 3204, the Drug Quality and Security Act (DQSA) and President Obama signed it into law (P.L. 113-54) on November 27, 2013. Prior to the passage of the DQSA, these outside suppliers operated as licensed pharmacies and in some cases also registered as drug establishments with the FDA. However, the authority for FDA to inspect and enforce either cGMPs or USP standards was unclear. DQSA is designed to provide that clarity as well as delineate the accountability between the FDA and state boards.

ASHP advocates federal oversight of certain entities that compound and engage in interstate commerce to address the wider public health threat when these preparations can potentially be distributed nationwide. ASHP continues to call for state regulation of compounding by health professionals (including pharmacists, physicians, and nurses) that would require meeting the applicable USP standards. ASHP believes that federally registered compounding facilities should be required to meet applicable cGMPs and that state-registered facilities engaged in “traditional compounding” (i.e., compounding for specific patient prescriptions or in anticipation of specific patient prescriptions or medication orders) be
required to meet applicable USP standards. ASHP also advocates for inspection by the relevant regulatory body, training of inspectors, and enhanced communication among federal and state regulatory authorities. Finally, ASHP calls for standard definitions and nomenclature for certain terms that may have different definitions within federal law and regulation and between federal and state law and regulation (FDA, Drug Enforcement Administration [DEA], pharmacy practice act and regulation).

1407
340B DRUG PRICING PROGRAM SUSTAINABILITY

This policy was superseded by ASHP policy 1908.

1408
STATE PRESCRIPTION DRUG MONITORING PROGRAMS

Source: Council on Public Policy

To advocate for mandatory, uniform prescription drug monitoring programs that collect real-time, relevant, and standard information from all dispensing outpatient entities about controlled substances and monitored prescriptions; further,

To advocate that the design of these programs should balance the need for appropriate therapeutic management with safeguards against fraud, misuse, abuse, and diversion; further,

To advocate that such programs be structured as part of electronic health records and exchanges to allow prescribers, pharmacists, and other practitioners to proactively monitor data for appropriate assessment; further,

To advocate for full interstate integration to allow for access by prescribers, pharmacists, and other qualified designees across state lines; further,

To advocate for federal and state funding to establish and administer these programs; further,

To promote research, education, and implementation of best practices in prescription drug monitoring programs.

This policy was reviewed in 2019 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

Rationale

ASHP recognizes the important contributions to public health made by state prescription drug monitoring programs (PDMPs). To be effective, these programs need to be mandatory; must collect standardized, relevant, and real-time information for analysis and comparison among states; and need to be universal. Some PDMPs do not update information in real time. When updating lags reporting by days (or even weeks), program effectiveness is compromised.
Moreover, relevant information is sometimes not required, and not all dispensing sites are required to participate, which impacts the ability of practitioners to make relevant clinical decisions. PDMPs need to be fully integrated across state lines so information from other jurisdictions is available to practitioners and prescribers to assist them in balancing the goals of discouraging prescription drug abuse while providing appropriate therapeutic management. It is also important to ensure the integration and interoperability of these programs with the evolving use of electronic health records and information exchanges so that prescription monitoring programs can be an educational tool for prescribers and practitioners. Finally, adequate state and federal funding is essential to sustain the viability of these programs and to encourage research, education, and implementation of best practices in PDMPs. Such research and education would serve to raise awareness about how to best address the growing public health issue of prescription drug abuse and misuse.

1409
APPROVAL OF BIOSIMILAR MEDICATIONS

This policy was superseded by ASHP policy 1816.

1410
ACCESS TO ORAL CONTRACEPTIVES THROUGH AN INTERMEDIATE CATEGORY OF DRUG PRODUCTS

Source: Council on Therapeutics

To advocate that oral contraceptives be provided only under conditions that ensure safe use, including the availability of counseling to ensure appropriate self-screening and product selection; further,

To support expanded access to these products through a proposed intermediate category of drug products, as described by ASHP policy, that would be available from all pharmacists and licensed health care professionals (including pharmacists) who are authorized to prescribe medications; further,

To advocate that the proposed reclassification of these products be accompanied by coverage changes by third-party payers to ensure that patient access is not compromised and that pharmacists are reimbursed for the clinical services provided.

This policy was reviewed in 2019 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

Rationale

There have been repeated calls to make oral contraceptive products more widely available, with the intent of expanding access to women’s reproductive health therapies and reducing unintended pregnancies. These proposals have merit, but ASHP believes that there are important differences in safety and effectiveness profiles for drug products within this class that necessitate the availability of a pharmacist or other health care professional to provide
patient guidance. ASHP supports the availability of these products via an intermediate category of drug products, as the *ASHP Statement on Criteria for an Intermediate Category of Drug Products*, which would facilitate appropriate use of these therapies after patient assessment and professional consultation by a pharmacist or other licensed health care professional who is authorized to prescribe medications. Patient screening and product selection would be improved through pharmacist-provided counseling that assists patients in identifying absolute and relative contraindications (e.g., hypertension, heart or kidney disease) and assessing other patient-specific factors (e.g., adherence practices). This process would guide the determination of whether a progestin-only or combination oral contraceptive product would be more safe and effective for an individual patient. ASHP does not believe that the current model for behind-the-counter access to some drug products (e.g., pseudoephedrine, emergency contraception) is appropriate for oral contraceptives because it would place the pharmacist in a gatekeeping role, not the clinical one that is necessary to ensure safe and effective use of these therapies.

Given the intent to expand access to these therapies, ASHP advocates that the proposed reclassification should not result in increased costs to women. Modifications to national, regional, and local drug coverage decisions may be needed to ensure that payer policies do not unintentionally restrict or prevent access. In addition, ASHP believes that the reclassification would result in increased workload and potential liability associated with pharmacist provision of this care, which includes patient screening, product selection, counseling, therapeutic monitoring, and documentation of the care provided in the pharmacy and medical record. Therefore, ASHP advocates that pharmacists should be compensated for these and other patient-care services as described in ASHP policy 1502, *Pharmacist Recognition as a Health Care Provider*.

1411

EXPEDITED PATHWAYS FOR FDA DRUG APPROVAL

*Source: Council on Therapeutics*

To support the use of expedited pathways for Food and Drug Administration (FDA) approval of new drugs that expand access to innovative therapies while protecting patient safety; further,

To advocate for the development of unique labeling requirements that would be used on an interim basis to identify products approved by these pathways in order to increase awareness of data limitations and guide clinician use of these drugs until additional evidence becomes available; further,

To advocate that the FDA be diligent in enforcing postmarketing commitments for drug products approved via expedited pathways, including utilizing its existing authority to enforce penalties when these requirements are not met; further,

To encourage research to evaluate the impact of expedited pathways on drug product development and patient care, including drug development timelines and costs, overall health care costs, patient access to care, and the effectiveness and safety of these therapies.
Rationale
Expedited approval programs provided by the FDA have resulted in substantial public health benefits as illustrated by the use of surrogate endpoints to approve therapies for HIV and AIDS in the 1990s. The FDA provides four mechanisms to expedite the development and review process for drugs: fast track designation, breakthrough therapy designation, accelerated approval, and priority review designation. The structure and requirements for each of these mechanisms differ as described in a 2013 draft guidance for industry. However, to qualify for any of these programs a drug must (1) address an unmet medical need, (2) provide benefit over available drug treatments, and (3) be used in the treatment of a serious or life-threatening condition. Further, the FDA guidance states that these programs are “intended to help ensure that therapies for serious conditions are approved and available to patients as soon as it can be concluded that the therapies’ benefits justify their risks.” Processes used to ensure a favorable risk–benefit profile include, but are not limited to, requirements for postmarketing studies to evaluate safety and effectiveness of the drug as used in real-world scenarios. However, the accelerated approval program is the only program that includes postmarketing studies as a requirement of the program. The FDA has discretion to require additional studies on a case-by-case basis for drug products approved via the other expedited mechanisms. Despite these safeguards, some features of these programs (e.g., smaller clinical trials, alternate trial designs, or limited-duration trials) can result in increased patient risk because less is known about a drug’s side effect profile and efficacy due to limited patient exposure. In addition, as with all drugs, safety assessments benefit from use of the drug in post-approval patient populations, which better reflect real-world use as compared to the controlled environment of a clinical trial.

Because these drugs represent medical advances, their post-approval use can be extensive. Further, off-label use of these drug products, like all therapies, is common. However, prescribers and other clinicians are frequently unaware that an expedited pathway was utilized and that evidence limitations exist. This scenario raises significant concerns about whether there is sufficient clinician awareness to ensure appropriate use of drugs approved via these pathways. Therefore, ASHP proposes unique labeling requirements that would increase awareness through use of a logo or other mechanism that would be used on an interim basis to inform clinicians about data limitations and provide guidance on appropriate use. This labeling would describe appropriate patient populations and monitoring parameters. Similar labeling requirements have been proposed for a new pathway being considered for the development of antibiotics used to treat life-threatening infections. ASHP supports the approach, but recommends that the increased labeling requirements be discontinued once the drug product manufacturer and FDA agree that sufficient data is available to support safe and effective use, or after the drug manufacturer completes any required postmarketing study commitments.

Given data limitations associated with approval of these therapies, ASHP advocates that the FDA be extremely diligent in ensuring that postmarketing commitments are met. Further, the FDA should use its existing authority as described under 21 CFR 314 subpart H and 21 CFR 601 subpart E if timelines or expectations for these commitments are not satisfactory. This authority allows the FDA to take legal action through penalties that include requiring labeling changes or rescinding marketing approval.

Finally, ASHP believes that there is a need for research to determine whether these expedited pathways are achieving the desired benefits, which include decreasing the time and
costs associated with drug product development, lowering overall health care costs, and increasing patient access to safe and effective drug therapies.

This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1412
FDA OVERSIGHT OF LABORATORY-DEVELOPED TESTS
Source: Council on Therapeutics

To advocate that the Food and Drug Administration be granted increased authority to regulate laboratory-developed tests as medical devices, including tests used for pharmacogenetic testing; further,

To support development of a risk-based framework for regulatory oversight of laboratory-developed tests that promotes innovation while providing a mechanism to ensure that test results are reliable, reproducible, and clinically relevant; further,

To encourage expanded availability of commercially marketed pharmacogenetic tests that would be available for use by laboratory and health care professionals to guide drug therapy.

Rationale
The use of *in vitro* pharmacogenetic tests has become increasingly common as efforts continue to achieve the promise of personalized medicine. However, the current system of regulatory oversight of these and other laboratory tests used to guide drug therapy is complex and inconsistent. Some laboratory tests (e.g., companion diagnostics devices) receive premarket review and approval by the Food and Drug Administration (FDA) when the test is either developed in tandem with drug development or following the drug’s approval. Other tests, commonly called laboratory-developed tests (LDTs), are proprietary tests that are developed and validated for use at specific laboratory facilities. These tests do not undergo premarket review and approval by the FDA. LDTs currently fall under a mixed system of oversight by the FDA and Centers for Medicare & Medicaid Services (CMS), which regulates these tests based on facilities’ compliance to the Clinical Laboratory Improvement Amendments (CLIA). CLIA compliance serves as the primary mechanism for oversight, as the FDA has traditionally practiced discretionary authority, meaning that only a few of the most complex tests are scrutinized by that agency. While an LDT is monitored for validity and reliability at the laboratory where it is conducted, results may not be reproducible if the test is conducted at a different laboratory site. This variability complicates the interpretation and application of this information in patient care. Therefore, ASHP advocates for the FDA to have increased authority to regulate these LDTs as medical devices to ensure that results are reliable, reproducible, and clinically relevant to patient care.

Development of a risk-based framework represents the ideal model to provide sufficient oversight while creating conditions that support continued innovation in this field. Further, the development of nationally validated and marketed tests that are available for use by laboratory
and health care professionals is desirable. ASHP believes that this scenario would provide the most assurance to pharmacists and other health care professionals that the results of these tests are reliable, reproducible, and clinically relevant to patient care.

1413
ENSURING EFFECTIVENESS, SAFETY, AND ACCESS TO ORPHAN DRUG PRODUCTS

This policy was superseded by ASHP policy 1821.

1414
CULTURAL COMPETENCY AND CULTURAL DIVERSITY

This policy was superseded by ASHP policy 1613.

1415
CREDENTIALING, PRIVILEGING, AND COMPETENCY ASSESSMENT
Source: Council on Education and Workforce Development

To support the use of post-licensure credentialing, privileging, and competency assessment to practice pharmacy as a direct patient-care practitioner; further,

To advocate that all post-licensure pharmacy credentialing programs meet the guiding principles established by the Council on Credentialing in Pharmacy; further,

To recognize that pharmacists are responsible for maintaining competency to practice in direct patient care.

This policy was reviewed in 2019 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

Rationale
Pharmacists engaged in direct patient care should possess the education, training, and experience necessary to function effectively, efficiently, and responsibly in that role. As their role in direct patient care has increased, pharmacists have recognized that they are independently responsible for maintaining their credentials and competencies. Currently, no specific objective measures are available for determining competence to provide direct patient care, however. Until such measures are available, pharmacists can establish their competence through post-licensure education, training, and certification, and health care organizations can ensure that practitioners with the right skills are matched to the scope of practice expected through competency assessment and their credentialing and privileging processes.

Although many avenues of credentialing and competency assessment currently exist, hospital and health-system credentialing and privileging of pharmacists is a relatively recent phenomenon. ASHP and the Council on Credentialing in Pharmacy (CCP) are in agreement that pharmacists should be expected to participate in credentialing and privileging processes to ensure they have attained and maintain competency to provide the scope of services and
quality of care that are required in their practices (Council on Credentialing in Pharmacy Guiding Principles for Post-Licensure Credentialing of Pharmacists, February 2011.) To ensure the quality of post-licensure credentialing programs, they should be required to adhere to the guiding principles developed by CCP.

Note that several definitions are integral to proper understanding of this policy (definitions taken from the Council on Credentialing in Pharmacy, Credentialing in Pharmacy: A Resource Paper, except as noted):

**Credential:** documented evidence of professional qualifications.

**Credentialing:** (1) the process of granting a credential, and (2) the process by which an organization obtains, verifies, and accesses and individual’s qualifications to provide patient care services.

**Privileging:** the process by which an oversight body of a health care organization or other appropriate provider body, having reviewed an individual health care provider’s credentials and performance and found them satisfactory, authorizes that individual to perform a specific scope of patient care services within that setting.

**Competence:** The ability of the individual to perform his/her duties accurately, make correct judgments, and interact appropriately with patients and colleagues.

**Competency:** A distinct knowledge, skill, attitude, or value that is essential to the practice of a profession.

**Direct patient care:** involves the pharmacist’s direct observation of the patient and his or her (i.e., the pharmacist’s) contributions to the selection, modification, and monitoring of patient-specific drug therapy. This is often accomplished within an interprofessional team or through collaborative practice with another health care provider. (American College of Clinical Pharmacy definition, as endorsed in: Council on Credentialing in Pharmacy. Scope of contemporary pharmacy practice: roles, responsibilities, and functions of pharmacists and pharmacy technicians.)

1416

**PHARMACY DEPARTMENT BUSINESS PARTNERSHIPS**

*This policy was superseded by ASHP policy 1915.*

1417

**INTEGRATION OF PHARMACY SERVICES IN MULTIFACILITY HEALTH SYSTEMS**

*Source: Council on Pharmacy Management*

To advocate that pharmacists are responsible for organizational efforts to standardize and integrate pharmacy services throughout the entire pharmacy enterprise in multifacility health systems and integrated delivery networks; further,

To educate health-system administrators about the importance of pharmacy leadership in setting system-wide policy regarding the safe and effective use of medications; further,
To advocate for the regulations and resources needed to support efforts to achieve optimal patient health outcomes in multifacility organizations.

This policy was reviewed in 2019 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

Rationale
Data from a 2011 American Hospital Association annual survey of hospitals indicate that at the time of the survey, 4432 of 5724 hospitals were part of either a system or a network, reflecting the evolution of the health care enterprise from single hospitals to integrated systems and networks. Multiple hospitals organized and owned by the same system have been in the United States marketplace for decades, but the rapidly changing marketplace in the past 2–3 years seems to foreshadow a future in which every hospital in the country will be part of a system. These systems have become increasingly complex as they also delve into non-hospital based businesses and seek to standardize and gain economies of scale across the organization.

These new organizations and the recognition of the importance of medication management to the overall health of these organizations have led to new roles and new challenges for pharmacy leaders. The pharmacy enterprise of the future will be more sophisticated and corporate in its nature. Pharmacy leaders both at the local hospital and at the corporate level have to more so than ever look at their pharmacy services in the context of the overall goals and needs of the organization or health system and determine the most efficient and effective means to provide these services. Leadership of the pharmacy must evolve from a department leader in a single facility to an effective corporate leader of medication use across a wide array of business units, care settings, and organizations. Centralization of medication management services is no longer confined to drug distribution but also includes human resources management, integrity of the electronic health record and related patient-care information, and oversight of various business partners. Pharmacy leaders within these evolving health systems will have many challenges, ranging from communication among the pharmacy management team, decisions on pharmacy infrastructure purchases and contracting, identification of critical services and standardization, succession planning and workforce development, supply chain management, human resource coordination, and strategic planning across diverse hospitals within the system. Further challenging health system pharmacy leaders are coordinating pharmacy services across larger geographical regions.

The nature and culture of decision making will be changed as some decisions become more centralized and corporatized and new practice models are developed to capitalize and adapt to the changing marketplace. Especially as merged systems extend beyond local and regional markets, health care will likely become even more business-like in its decision-making and fewer decisions will be made at the local facility level. The pharmacy enterprise will need to adapt to this changing environment. Many important decisions that influence medication-use policy will be made at the level of corporate leadership, and it will be critical that pharmacists provide leadership in this corporate decision-making. The ability to demonstrate the financial impact of pharmacy services will be critical and the development and implementation of effective drug-use policy across the enterprise will be crucial to success.

Along with increasing consolidation and integration of health systems, the business
model for health care is also evolving. Pharmacy leaders will need to become familiar with changing business imperatives and align the pharmacy business plan with that of the health system. Planning must integrate at both the strategic and tactical level. Pharmacy needs to be envisioned as a service rather than a department. These changes have resulted in the need to evaluate best practices, legal and regulatory requirements, and leadership structure.

This policy was reviewed in 2019 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

1418
RISK ASSESSMENT OF HEALTH INFORMATION TECHNOLOGY
Source: Council on Pharmacy Management

To urge hospitals and health systems to directly involve departments of pharmacy in performing appropriate risk assessment before new health information technology (HIT) is implemented or existing HIT is upgraded, and as part of the continuous evaluation of current HIT performance; further,

To advocate that HIT vendors provide estimates of the resources required to implement and support new HIT; further,

To collaborate with HIT vendors to encourage the development of HIT that improves patient-care outcomes; further,

To advocate for changes in federal law that would recognize HIT vendors’ safety accountability.

This policy was reviewed in 2019 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

Rationale
The adoption of HIT in hospitals has been increasing at a quickening pace. The ASHP National Survey – 2012 reports the adoption of the following: full paperless electronic health record (EHR) (18.6%), computerized provider order entry with clinical decision support (CPOE with CDS) (54.4%), bar-coded medication administration (BCMA) (65.5%), and smart pumps (77%). The adoption of HIT has undoubtedly been spurred by the American Recovery and Reinvestment Act (ARRA) and the Health Information Technology for Economic and Clinical Health Act (HITECH) provisions under Meaningful Use (MU) of the EHR. Hospitals have been incentivized to implement EHRs that meet the MU criteria by increased reimbursement through Medicare and/or Medicaid payments. Due to the strict guidelines and the rush to meet incentive payments, many providers are questioning whether some HIT is being implemented too quickly.

The implementation of HIT within the medication-use process has been proven to prevent and decrease errors, improve quality, and prevent waste. A key premise of the Office of the National Coordinator for Health Information Technology (ONC) report “Health Information
Technology Patient Safety Action & Surveillance Plan” (July 2013) is that HIT, when fully integrated into health care delivery organizations, facilitates substantial improvements in health care quality and safety as compared to paper records. As hospitals and providers implement HIT within their institutions and practices, however, they often encounter new types of errors and problems. The medical literature is starting to see reports of these unintended consequences of HIT, so continuous monitoring of these systems is required. It has become increasingly important to properly assess the interface between HIT and users to identify whether any new risk has been introduced to the system and implement HIT appropriately, taking into account medication-use processes and human factors. Critical questions hospitals and health systems face include (1) when do HIT advances exceed the capacity for integration into workflow, (2) when does HIT begin to introduce risk into the medication-use process rather than improve patient safety, and (3) what are the accountabilities of HIT providers, regulators, and providers to ensure the necessary product development and assessments are made before implementation of new HIT.

ASHP advocates that the pharmacy department be part of the implementation team for any medication-related technology within an institution. Technology assessment tools should be applied by pharmacists and others to proactively determine gaps in function prior to implementation, during upgrades, and as part of the continuous evaluation of HIT performance. The use of failure modes effects analysis (FMEA) and other resources should be considered. Risk assessment should also be considered when implementing any new technology to ensure that unintended consequences are minimized.

Regulatory and accreditation organizations include components of risk assessment and quality improvement within their criteria, but hospitals need to incorporate these into their overall plans. Such risk assessments could result in less attention on some HIT implementations. Finally, federal law need to recognize vendors’ accountability for the safety of their products as implemented.

1419

DOCUMENTATION OF PATIENT-CARE SERVICES IN THE PERMANENT HEALTH RECORD

Source: Council on Pharmacy Management

To advocate for public and organizational policies that support pharmacist documentation of patient-care services in the permanent patient health record to ensure accurate and complete documentation of the care provided to patients and to validate the impact of pharmacist patient care on patient outcomes and total cost of care; further,

To advocate that electronic health records be designed with a common documentation space to accommodate all health care team members and support the communication needs of pharmacy.

This policy supersedes ASHP policy 0407.

Rationale

Documentation in the patient record is a critical for a complete record for patient care and communication among members of the health care team. Documentation should be done
within an electronic health record (EHR) or on paper. When documenting electronically, use of standardized and coded formats will allow for improved patient outcome measurements.

1420
MANUFACTURER-SPONSORED PATIENT-ASSISTANCE PROGRAMS

This policy was superseded by ASHP policy 1806.

1421
ASHP STATEMENT ON THE PHARMACIST’S ROLE IN CLINICAL PHARMACOGENOMICS
Source: Section of Clinical Specialists and Scientists

To approve the ASHP Statement on the Pharmacist's Role in Clinical Pharmacogenomics.
2013 Policy Positions

1301
PAYER PROCESSES FOR PAYMENT AUTHORIZATION AND COVERAGE VERIFICATION
Source: Council on Pharmacy Management

To advocate that public and private payers collaborate with each other and with health care providers to create standardized and efficient processes for authorizing payment or verifying coverage for care; further,

To advocate that payment authorization and coverage verification processes (1) facilitate communication among patients, providers, and payers prior to therapy; (2) provide timely payment or coverage decisions; (3) facilitate access to information that allows the pharmacist to provide prescribed medications and medication therapy management to the patient; and (4) foster continuity in patient care.

This policy supersedes ASHP policy 1206.

Rationale
Patients and health care providers are required to navigate an array of payment requirements from private and public payers. Private insurers enforce their own prior authorization procedures, state Medicaid programs have their individual program requirements, and Medicare has its local and national coverage determinations. These payment authorization and verification processes vary considerably from payer to payer and are time consuming and needlessly complex. The required data, forms of documentation required, submission processes, coverage verification procedures, and delivery of approval vary widely among payers. These processes are often not integrated into the patient-care process and require manual documentation and submission. The lack of timely review and approval may delay patient care. Payment authorization and verification processes should effectively facilitate communication among both patients and providers, should be standardized and automated, and should result in timely decisions that do not disrupt patient care.

1302
INTEROPERABILITY OF PATIENT-CARE TECHNOLOGIES
Source: Council on Pharmacy Management

To encourage interdisciplinary development and implementation of technical and semantic standards for health information technology (HIT) that would promote the interoperability of patient-care technologies that utilize medication-related databases (e.g., medication order processing systems, automated dispensing cabinets, intelligent infusion pumps, electronic health records); further,

To encourage the integration, consolidation, and harmonization of medication-related databases used in patient-care technologies to reduce the risk that outdated, inaccurate, or
conflicting data might be used and to minimize the resources required to maintain such databases.

**Rationale**
There are significant pharmacy management issues associated with the multiplicity of medication databases in hospitals and health systems. Among the issues are lack of standardization in the medication databases used in pharmacy order-processing systems, automated dispensing cabinets, intelligent infusion pumps, electronic health records, and other patient-care-related technologies dependent on accurate and harmonized medication databases. In addition, there is variability in the primary sources of medication information in these databases and in how the databases are updated. The longstanding issue of lack of interoperability of medication-related information technology compounds the problem. The risk-management implications of this situation are not fully understood, but the urgent need to address this complex issue increases as the dependence on information technologies and the accuracy of associated information proliferates to more aspects of patient care.

Although it is important to recognize the differences among technologies used in patient care, there is a need to have both a standardized format to describe medications as well as means for efficiently managing the medication databases in order to safely populate and update the different technologies that rely on drug information. Coalitions such as the Pharmacy e-Health Information Technology Collaborative are increasingly important in providing expertise, organizing and participating in stakeholder events, and advocating for best practices. It may, however, be necessary for other organizations to convene stakeholders to develop standards for the harmonization of medication-related databases.

*This policy was reviewed in 2018 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.*

1303  
**PROLIFERATION OF ACCREDITATION ORGANIZATIONS**

*This policy was superseded by ASHP policy 1810.*

1304  
**DRUG PRODUCT REIMBURSEMENT**

*This policy was superseded by ASHP policy 1807.*

1305  
**EDUCATION ABOUT PERFORMANCE-ENHANCING SUBSTANCES**  
*Source: Council on Pharmacy Practice*  
To encourage pharmacists to engage in community outreach efforts to provide education to athletes on the risks associated with the use of performance-enhancing substances; further,
To encourage pharmacists to advise athletic authorities and athletes on the dangers of performance-enhancing substances and other products that are prohibited in competition; further,

To advocate for the role of the pharmacist in all aspects of sports doping control.

This policy supersedes ASHP policy 0710.

Rationale
The risks of using performance-enhancing substances, more commonly called performance-enhancing drugs (PEDs), are well documented in sports medicine journals and other biomedical literature. The U.S. Anti-Doping Agency (USADA) maintains a comprehensive list of performance-enhancing substances that are banned for U.S. athletes competing in the Olympics. In addition to anabolic steroids, the list includes hormones and hormone-like substances (e.g., insulin, tamoxifen); beta-2 agonists; diuretics; red blood cells (RBC) in any form and RBC enhancers; agents that alter genes or genetic expression; stimulants (including caffeine and nicotine); narcotics; cannabinoids; and glucocorticoids. Certain dietary supplements that are known to contain prohibited substances are also banned. The FDA has also identified dietary supplements that contain pathogens (e.g., Salmonella), contaminants (e.g., lead or mercury), or undeclared prescription drug ingredients (e.g., ephedrine, sildenafil, or dexamethasone).

Although such authorities as the National Collegiate Athletic Association and the USADA have implemented bans on use of these agents and drug testing policies to enforce them, these strategies have been only partially effective in curbing sports doping. Physical and emotional developmental changes during adolescence, as well as the desirable celebrity status of professional sports figures, place younger athletes at significant risk for PED use.

The incidence of PED use among young athletes and the lack of guidance on this topic prompted the American Academy of Pediatrics (AAP) to issue a policy statement in 2005 that provides a working definition of PEDs and strongly opposes their use. The statement also emphasizes the important role of health care professionals in educating younger athletes about the inflated claims and serious risks of sports doping products.

Use of PEDs has spread beyond professional athletes to military personnel, recreational body builders, professional entertainers, and others wishing to lose weight, increase muscle mass, improve alertness, and increase stamina. In 2011, an American College of Gynecology (ACOG) opinion statement addressed abuse of anabolic steroids, growth hormone, thyroid replacement products, and dietary supplements by women for cosmetic purposes. Risk factors among younger women (negative body image, social pressure to perform in high school or college sports, and risk-taking behaviors) may lead to steroid abuse as early as the late teens. While steroid use among women and girls is far less common than among men, abuse can lead to liver damage, hyperlipidemia, decreased glucose tolerance, increased cardiovascular disease, thrombotic events, psychosis, and infertility. ACOG recommended that health care professionals educate patients about the unfavorable benefit-to-risk ratio of steroid use, encourage cessation in suspected users, or refer them to substance abuse treatment programs.
This policy was reviewed in 2018 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

1306
STANDARDIZATION OF INTRAVENOUS DRUG CONCENTRATIONS
Source: Council on Pharmacy Practice

To develop nationally standardized drug concentrations and dosing units for commonly used high-risk drugs that are given as continuous infusions to adult and pediatric patients; further,

To encourage all hospitals and health systems to use infusion devices that interface with their information systems and include standardized drug libraries with dosing limits, clinical advisories, and other patient-safety-enhancing capabilities; further,

To encourage interprofessional collaboration on the adoption and implementation of standardized drug concentrations and dosing units in hospitals and health systems.

This policy supersedes ASHP policy 0807.

Rationale
Standardization and simplification are widely accepted methods for reducing variability in processes and risk for error. With increased adoption of intelligent infusion devices, use of standard concentrations has enhanced infusion safety by eliminating most dosing and rate calculations. Standardizing concentrations also simplifies ordering and preparation, and reduces risk of administration error. Attendees at ASHP’s 2008 IV Safety Summit affirmed this safety strategy with a similar recommendation. Summit participants also suggested that broader use of standard concentrations might stimulate industry to offer a broader array of ready-to-administer infusions and facilitate the development of drug libraries.

Recent reports indicate, however, that numerous concentrations of high-risk and other drugs are still routinely used. While acknowledging that not all patients can or should be treated with a standard concentration, the Council, Board, and House clarified that the intent of this policy was to advocate limiting the number of standard concentrations to those that serve the needs of the majority of patients.

Council members further suggested that broad adoption of standardized concentrations would not be achieved without the support of the health-system pharmacist community and its active engagement with interprofessional stakeholders, and the Board and House agreed.

This policy was reviewed in 2018 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

1307
PHARMACIST RECOGNITION AS A HEALTH CARE PROVIDER

This policy was superseded by ASHP policy 1502.
1308
COMPOUNDING BY HEALTH PROFESSIONALS

This policy was superseded by ASHP policy 1406.

1309
PHARMACISTS’ ROLE IN IMMUNIZATION
Source: Council on Public Policy

To affirm that pharmacists have a role in improving public health and increasing patient access to immunizations by promoting and administering appropriate immunizations to patients and employees in all settings; further,

To collaborate with key stakeholders to support the public health role of pharmacists and student pharmacists in the administration of adult and pediatric immunizations; further,

To advocate that states grant pharmacists and appropriately supervised student pharmacists the authority to initiate and administer all adult and pediatric immunizations; further,

To advocate that pharmacists and student pharmacists who have completed a training and certification program acceptable to state boards of pharmacy and meeting the standards established by the Centers for Disease Control and Prevention may provide such immunizations; further,

To advocate that state and federal health authorities establish centralized databases for documenting administration of immunizations that are accessible to all health care providers; further,

To advocate that state and federal health authorities require pharmacists and other immunization providers to report their documentation to these centralized databases, if available; further,

To strongly encourage pharmacists to educate all patients, their caregivers, parents, guardians, and health care providers about the importance of immunizations for disease prevention; further,

To encourage pharmacists to seek opportunities for involvement in disease prevention through community immunization programs; further,

To advocate for the inclusion of pharmacist-provided immunization training in college of pharmacy curricula.

This policy supersedes ASHP policies 1220 and 0213.
Rationale
Increasing adult and pediatric patients’ access to immunizations is an important public health challenge. Pharmacists’ unique training and expertise in all aspects of the medication-use system can help expand patients’ access to immunizations and promote disease prevention in all practice settings. Hospital and health-system pharmacists provide care to a patient population that is vulnerable and often critically ill, and such patients are especially dependent on herd immunity. Patients in rural areas, where a pharmacy may provide the only convenient access to a health care professional, will benefit from increased pharmacist immunization authority.

Although all states permit pharmacist administration of some vaccines, state laws differ in the range of vaccines pharmacists may administer and the patient populations they are permitted to vaccinate. Allowing trained and certified pharmacists, including student pharmacists, to initiate and administer all adult and pediatric vaccines (e.g., by eliminating the requirement that some pharmacist-provided immunizations to be conducted within a collaborative drug therapy management agreement) would encourage standardization of pharmacy immunization practice within and among states.

Only pharmacists and student pharmacists who undergo appropriate training and certification should be authorized by state boards to provide immunizations. To ensure their consistency and quality, those training and certification programs should meet Centers for Disease Control and Prevention (CDC) standards. To aid in sharing important patient immunization information, centralized databases of patient immunizations should be established, and all authorized immunization providers, including pharmacists, should be required by law or regulation to document their immunizations in those databases when they become available.

Pharmacists, student pharmacists, and pharmacy educators should embrace their role in this important public health effort by providing education about the importance of immunization in disease prevention, participating in community immunization programs, and training immunization providers.

This policy was reviewed in 2018 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1310
REGULATION OF TELEPHARMACY SERVICES
Source: Council on Public Policy

To advocate that state governments adopt laws and regulations that standardize telepharmacy practices across state lines and facilitate the use of United States-based telepharmacy services; further,

To advocate that boards of pharmacy and state agencies that regulate pharmacy practice include the following in regulations for telepharmacy services: (1) education and training of participating pharmacists; (2) education, training, certification by the Pharmacy Technician Certification Board, and licensure of participating pharmacy technicians; (3)
communication and information systems requirements; (4) remote order entry, prospective order review, verification of the completed medication order before dispensing, and dispensing; (5) direct patient-care services, including medication therapy management services and patient counseling and education; (6) licensure (including reciprocity) of participating pharmacies and pharmacists; (7) service arrangements that cross state borders; (8) service arrangements within the same corporate entity or between different corporate entities; (9) service arrangements for workload relief in the point-of-care pharmacy during peak periods; (10) pharmacist access to all applicable patient information; and (11) development and monitoring of patient safety, quality, and outcomes measures; further,

To identify additional legal and professional issues in the provision of telepharmacy services to and from sites located outside the United States.

This policy supersedes ASHP policy 0716.

Rationale
In light of continuing advances in technology, there an increasingly urgent need for state board of pharmacy regulation of the provision of pharmacist care services from off-site locations through electronic technology (telepharmacy). It is important to acknowledge the regulatory purview of state boards of pharmacy regarding the use of telepharmacy and recognize that the intent of such regulations should be to balance protection of the public health with the increased patient access to the patient care services of pharmacists provided by telepharmacy. Although such regulations should allow for various arrangements across state borders and within or between health systems, they all need to address a number of common concerns.

ASHP policy 0716 was revised to address the provision of medication therapy management and other direct patient-care services in any regulation of telepharmacy services and to advocate that patient safety, quality, and outcomes measures be developed and monitored. The policy was also revised to include advocacy to state governments to harmonize the practice of pharmacy across state lines and to update requirements for technician functions in the provision of telepharmacy services be performed by technicians that are certified by the Pharmacy Technician Certification Board (PTCB) and licensed by the state board of pharmacy. The revised policy also calls on ASHP to continue efforts to identify additional legal and professional issues in the provision of international telepharmacy services.

This policy was reviewed in 2018 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1311
REGULATION OF CENTRALIZED ORDER FULFILLMENT
Source: Council on Public Policy

To advocate changes in federal and state laws, regulations, and policies to permit centralized medication order fulfillment within health care facilities under common ownership.

Rationale
The Council discussed the increased use of centralized order fulfillment within health systems as well as fulfillment by contracted entities. Health systems use centralized facilities to provide a range of medications in order to improve efficiency, decrease redundancy, optimize preparation expertise, and decrease overhead and inventory costs. Importantly, health systems use centralized facilities to provide medications that are in short supply or are difficult to compound safely.

The Drug Enforcement Administration prohibits central repackaging and distribution of controlled substances to other facilities that are part of the same health system. Moreover, health systems with facilities in multiple states find additional requirements in each state by boards of pharmacy and other state regulators when providing medications across state borders from a centralized facility.

The Council and Board recognized the importance of maintaining practice standards and related safeguards to assure patient safety. In fact, health systems use centralized facilities in order to have the most-qualified personnel prepare these medications in the safest facility. The Council and Board identified the need to seek regulatory changes at the state and federal level in order to optimally use centralized facilities that are under the common ownership and therefore quality control of the health system.

This policy was reviewed in 2018 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1312
MEDICATION OVERUSE

This policy was superseded by ASHP policy 1822.

1313
DRUG-CONTAINING DEVICES
Source: Council on Therapeutics

To recognize that use of drug-containing devices (also known as combination devices) has important clinical and safety implications for patient care; further,

To advocate that use of such devices be documented in the patient's medical record to support clinical decision-making; further,

To encourage pharmacists to participate in interprofessional efforts to evaluate and create guidance on the use of these products through the pharmacy and therapeutics committee process to ensure patient safety and promote cost-effectiveness; further,

To advocate that the Food and Drug Administration (FDA) and device manufacturers increase the transparency of the FDA approval process for drug-containing devices, including access to data used to support approval; further,
To encourage research that evaluates the clinical and safety implications of drug-containing devices to inform product development and guide clinical practice.

This policy was reviewed in 2018 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

Rationale
The Council, Board, and House of Delegates considered the rapid growth in FDA-approved devices and other products that contain drug therapies. As defined by the FDA, a combination product is “a product comprised of two or more regulated components, i.e., drug/device, biologic/device, drug/biologic, or drug/device/biologic, that are physically, chemically, or otherwise combined or mixed and produced as a single entity” or “two or more separate products packaged together in a single package or as a unit and comprised of drug and device products, device and biological products, or biological and drug products.” Examples include, but are not limited to, antibiotic-loaded bone cement (ALBC), drug-eluting catheters and stents, and hemostatic sponges and other products used for wound care. The Council stated that drugs in these products have a therapeutic effect, impact overall patient care, and in some instances may result in drug interactions and adverse drug events, and the Board and House agreed. For these reasons, the Council, Board, and House advocated for documentation of the use of these products in patients’ medical records.

Pharmacists usually are not involved in decisions about how these products will be used within the health system. In addition to patient safety concerns, other shortcomings of this approach include lost revenue because these products are frequently not accurately billed or tracked as inventory. The Council, Board, and House strongly encouraged pharmacists to participate in interprofessional discussions concerning use of these products and suggested that the pharmacy and therapeutics (P&T) committee may provide the ideal mechanism to conduct these evaluations.

The FDA provides recommendations for drug-device development in Guidance for Industry and Staff: Early Development Considerations for Innovative Combination Products, including a suggestion that additional preclinical or clinical studies may be needed to evaluate “the potential for change in the established or understood safety, effectiveness, and/or dosing requirements” when a previously approved drug product is incorporated into a combination device. However, the Council emphasized that these studies are recommended, not required, by the FDA, and the Board and House agreed. In addition, it was noted that even when these studies are completed, information from these studies is not widely available or easily accessible. Finally, it is not always apparent why a specific combination product receives a primary product assignment as a device or drug, which is important because this assignment can impact the approval pathway. Advocacy to the FDA and manufacturers of drug-containing devices was recommended by the Council, Board, and House to improve the transparency of the approval process and access to information.

There is often little research concerning the interplay of drugs and devices (e.g., the rate and extent of drug release from the device) or pharmacodynamics once these devices are administered, applied, or implanted in the patient. Further, little is known about the contribution of ALBC or antibiotic beads and spacers to antimicrobial resistance. Therefore, the
Council, Board, and House encouraged research that could inform product manufacturers during the development process and provide information to clinicians about use of these products in patient care.

**1314**

**DEA SCHEDULING OF HYDROCODONE COMBINATION PRODUCTS**

*This policy was discontinued in 2018.*

**1315**

**DEA SCHEDULING OF CONTROLLED SUBSTANCES**

*Source: Council on Therapeutics*

To advocate that the Drug Enforcement Administration (DEA) establish clear, measurable criteria and a transparent process for scheduling determinations; further,

To urge the DEA to use such a process to re-evaluate existing schedules for all substances regulated under the Controlled Substances Act to ensure consistency and incorporate current evidence concerning the abuse potential of these therapies; further,

To monitor the effect of DEA scheduling of products under the Controlled Substances Act and other abuse-prevention efforts (e.g., prescription drug monitoring programs) to assess the impact on patient access to these medications and on the practice burden of health care providers.

*Rationale*

The Council discussed the DEA’s current classification structure used to determine the schedule of controlled substances as part of their discussion of proposals to reschedule hydrocodone combination products. The Council believed that the current stratification of abuse potential into low, moderate, and high categories lacks clarity and contributes to perception of inconsistency in assigning schedules. The Board concurred. The Council also noted that the existing schedules do not appear to take into account evolving evidence about the abuse potential of these drugs. Therefore, the Council and Board recommended that ASHP advocate that the DEA establish clear, measurable criteria, to the extent possible for this complex area, and a transparent process for scheduling determinations. Further, the DEA was encouraged to use those criteria to re-evaluate current schedule assignments for all controlled substances based on the most recent evidence.

*This policy was reviewed in 2018 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.*

**1316**

**PHARMACY RESIDENT AND STUDENT ROLES IN NEW PRACTICE MODELS**

*This policy was superseded by ASHP policy 1829.*
1317
EDUCATION AND TRAINING IN HEALTH CARE INFORMATICS
Source: Council on Education and Workforce Development

To recognize the significant and vast impacts of health-system information systems, automation, and technology changes on safe and effective use of medications; further,

To foster, promote, and lead the development of and participation in formal health care informatics educational programs for pharmacists, pharmacy technicians, and student pharmacists.

Rationale
With growing use of automation and technology, there is a growing need for informatics-trained pharmacists and pharmacy technicians, yet there are few training programs or residencies. This shortage of trained individuals has led to on-the-job training and potentially less-than-optimal implementation of new information systems and technology. New educational programs, or adaptation of existing ones, would help ease this lack of trained individuals and lead to better technology outcomes. To most effectively accomplish this goal, ASHP must lead the development of such programs and encourage participation by pharmacists, pharmacy students, and pharmacy technicians.

This policy was reviewed in 2018 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

1318
ASHP STATEMENT ON THE PHARMACIST’S ROLE IN SUBSTANCE ABUSE PREVENTION, EDUCATION, AND ASSISTANCE

This statement was superseded by ASHP Policy 1533.

1319
ASHP STATEMENT ON THE PHARMACY TECHNICIAN’S ROLE IN PHARMACY INFORMATICS
Source: Section of Pharmacy Informatics and Technology

To approve the ASHP Statement on the Pharmacy Technician’s Role in Pharmacy Informatics.
2012 Policy Positions

1201
PRECEPTOR SKILLS AND ABILITIES
Source: Council on Education and Workforce Development
To collaborate with pharmacy organizations on the development of standards to enhance the quality of experiential education and pharmacy residency precepting; further,

To provide tools, education, and other resources to develop preceptor skills.

Rationale
The quality of pharmacy education is directly tied to the quality and effectiveness of its preceptors. Growth in the number and size of colleges of pharmacy has increased demand for teaching sites and for qualified preceptors to provide experiential training and residency rotations at those sites. As a result, teaching sites are often selected with little proof of the quality of the site or the ability of its preceptors, and many of those preceptors lack experience or training in teaching and precepting students and residents. Although nearly all colleges of pharmacy try to provide preceptor training, their efforts to develop preceptors are often inconsistent and ineffective due to resource constraints. In addition to improved training of preceptors, the profession needs a mechanism for evaluating the skills of preceptors and teachers.

There has been little coordination of preceptor development at the national level. The quality and effectiveness of preceptors is important to the entire profession and deserves a national platform and dedicated resources.

This policy was reviewed in 2017 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

1202
QUALIFICATIONS AND COMPETENCIES REQUIRED TO PRESCRIBE MEDICATIONS
Source: Council on Education and Workforce Development
To affirm that prescribing is a collaborative process that includes patient assessment, understanding of the patient’s diagnoses, evaluation and selection of available treatment options, monitoring to achieve therapeutic outcomes, patient education, and adherence to safe and cost-effective prescribing practices; further,

To affirm that safe prescribing of medications, performed independently or collaboratively, requires competent professionals who complement each others’ strengths at each step; further,

To explore the creation of prescribing standards that would apply to all who initiate or modify medication orders or prescriptions and that would facilitate development of competencies and training of prescribers; further,
To encourage research on the effectiveness of current educational processes designed to train prescribers.

**Rationale**
Debate about health care providers' evolving scopes of practice, focused primarily on prescribing privileges, has raised the question of what training and competencies should be required of current or potential prescribers. The increasing complexity of medication use, growing diversity of professionals authorized to prescribe, and continuing high incidence of adverse drug events call for the development of standards for prescribing and further development of associated competencies and training requirements.

*This policy was reviewed in 2017 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.*

**1203 QUALIFICATIONS OF PHARMACY TECHNICIANS IN ADVANCED ROLES**
*Source: Council on Education and Workforce Development*

To recognize that highly trained and skilled pharmacy technicians working in advanced roles regularly perform complex and critical medication-use procedures, and that a safe and effective medication-use process depends significantly on the skills, knowledge, and competency of those pharmacy technicians to perform those tasks; further,

To reaffirm that all pharmacy technicians should complete an ASHP-accredited training program, be certified by the Pharmacy Technician Certification Board, and be licensed by state boards of pharmacy; further,

To advocate that beyond those requirements pharmacy technicians working in advanced roles should have additional training and should demonstrate ongoing competencies specific to the tasks to be performed; further,

To advocate that expansion of pharmacy technician duties into expanded, advanced roles should include consideration of potential risk to patients and that ongoing quality assurance metrics should be established to assure patient safety.

**Rationale**
A growing number of hospitals utilize pharmacy technicians in advanced or specialized roles beyond those traditionally filled by technicians: medication preparation, distribution, and purchasing. These advanced or specialized roles include performing medication reconciliation, collecting laboratory data, and managing automation and technology, among others. While there has been a good deal of discussion about minimum standards for education and training of pharmacy technicians in general, there has been little discussion about technicians in these specialized roles. These advanced roles will require different skills and competencies, and pharmacy technicians will require additional, task-specific training and should demonstrate
competency before being allowed to perform such tasks. Hospitals and health systems will need to consider the potential risk to patients of expanding the roles of pharmacy technicians and establish quality assurance metrics to assure patient safety.

_This policy was reviewed in 2017 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate._

**1204**

**ROLE OF STUDENTS IN PHARMACY PRACTICE MODELS**

_This policy was superseded by ASHP policy 1829._

**1205**

**REVENUE CYCLE COMPLIANCE AND MANAGEMENT**

_This policy was superseded by ASHP policy 1710._

**1206**

**PAYMENT AUTHORIZATION AND VERIFICATION PROCESSES**

_This policy was superseded by ASHP policy 1301._

**1207**

**FINANCIAL MANAGEMENT SKILLS**

*Source: Council on Pharmacy Management*

To foster the systematic and ongoing development of management skills for health-system pharmacists in the areas of (1) health-system economics, (2) business plan development, (3) financial analysis, (4) metrics for clinical and distributive services, (5) pharmacoeconomic analysis, (6) diversified pharmacy services, (7) compensation for pharmacists' patient-care services, and (8) revenue cycle compliance and management; further,

To encourage colleges of pharmacy to incorporate these management areas in course work and experiential education; further,

To encourage financial management skills development in pharmacy residency training programs and new practitioner orientation.

_This policy supersedes ASHP policy 0508._

**Rationale**

Revenue cycle compliance and management represent an increasingly important aspect of the business operations of hospitals and health systems. Pharmacy leaders must exert leadership in managing medication-related revenue cycle compliance in order to ensure financial success of
the health care enterprise. Pharmacy leaders must develop and maintain knowledge and skills in this area

This policy was reviewed in 2017 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

1208
TRANSITIONS OF CARE
Source: Council on Pharmacy Management

To recognize that continuity of patient care is a vital requirement in the appropriate use of medications; further,

To strongly encourage pharmacists to assume professional responsibility for ensuring the continuity of care as patients move from one setting to another (e.g., ambulatory care to inpatient care to home care); further,

To encourage the development, optimization, and implementation of information systems that facilitate sharing of patient-care data across care settings and providers; further,

To advocate that payers and health systems provide sufficient resources to support effective transitions of care; further,

To encourage the development of strategies to address the gaps in continuity of pharmacist patient care services.

Rationale
Health care reform will have a significant impact on the implementation of new pharmacy practice models. Changes in health care reimbursement will likely result in an increasing focus on the role of pharmacists at the transition of care from the acute care environment to other settings. ASHP policy 0301 will be increasingly important as health systems increase their focus on reducing readmissions, improving patient satisfaction, and effectively educating patients about their medications. It is important that ASHP advocate for improvements in information systems that facilitate sharing of patient information across various care settings. Further alignment of financial incentives and resources that encourage and support patient-care roles of pharmacists in the transition of care are also required.

This policy was reviewed in 2017 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

1209
VALUE-BASED PURCHASING
Source: Council on Pharmacy Management
To support value-based purchasing reimbursement models when they are appropriately structured to improve health care quality, patient satisfaction, and clinical outcomes, and encourage medication error reporting and quality improvement; further,

To encourage pharmacists to actively lead in the design and interdisciplinary implementation of medication-related value-based purchasing initiatives.

**Rationale**

Value-based purchasing is one aspect of a portfolio of health care reform incentives based on pay-for-performance principles. It is currently constructed of 12 clinical outcomes measures and one “measure” of patient experience utilizing the Hospital Consumer Assessment of Healthcare Providers and Systems Survey (HCAHPS). CMS is expanding its Potential Future Measures for Hospital Value-based Purchasing Program to consider the following measures for the **Hospital Value-based Purchasing Program**:

- Spending per Hospital Patient with Medicare
- Serious Complications and Deaths
- Hospital Acquired Conditions
- Emergency Department Wait Times
- Heart Patients Given a Prescription for Drugs called Statins at Discharge
- Central Line-associated Blood Stream Infection
- Surgical Site Infections
- Immunization for Influenza
- Immunization for Pneumonia
- Temperature Management for Patients after Surgery

ASHP policy 0708 needs to be broadened to include the concepts of value-based purchasing and incorporate the concepts of clinical outcomes and patient satisfaction in addition to quality. ASHP policy should recognize the pharmacist’s leadership role while explicitly acknowledging the interdisciplinary nature of initiatives designed to achieve value-based purchasing measures.

*This policy was reviewed in 2017 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.*

**1210**

**ROLE OF CORPORATE PHARMACIST LEADERSHIP IN MULTIFACILITY ORGANIZATIONS**

*This policy was superseded by ASHP policy 1417.*

**1211**

**PHARMACIST’S ROLE IN HEALTH CARE INFORMATION SYSTEMS**

*Source: Council on Pharmacy Management*

To strongly advocate key decision-making roles for pharmacists in the planning, selection, design, implementation, and maintenance of medication-use information systems, electronic health records, computerized provider order entry systems, and e-prescribing
To advocate for incentives to hospitals and health systems for the adoption of patient-care technologies; further,

To recognize that design and maintenance of medication-use information systems is an interdisciplinary process that requires ongoing collaboration among many disciplines; further,

To advocate that pharmacists must have accountability for strategic planning and direct operational aspects of the medication-use process, including the successful deployment of medication-use information systems.

This policy supersedes ASHP policy 0921.

Rationale
The Council discussed the evolving nature of health IT and the technology requirements for the pharmacy enterprise. The Council believed that current ASHP policy did not clearly describe the successful design and use of technology that supports the medication-use process as an interdisciplinary effort and voted to amend ASHP policy 0921 to reflect the interdisciplinary nature of the medication-use process that requires collaboration in design, implementation, and maintenance. The Council also believed that it was important that pharmacists have accountability for the medication-use process, including the successful deployment of medication-use information systems.

This policy was reviewed in 2017 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

1212
CLINICAL DECISION SUPPORT SYSTEMS
Source: Council on Pharmacy Management
To advocate for the development of clinical decision support (CDS) systems that are proven to improve medication-use outcomes and that include the following capabilities: (1) alerts, notifications, and summary data views provided to the appropriate people at the appropriate times in clinical workflows, based on (a) a rich set of patient-specific data, (b) standardized, evidence-based medication-use best practices, and (c) identifiable patterns in medication-use data in the electronic health record; (2) audit trails of all CDS alerts, notifications, and follow-up activity; (3) structured clinical documentation functionality linked to individual CDS alerts and notifications; and (4) highly accessible and detailed management reporting capabilities that facilitate assessment of the quality and completeness of CDS responses and the effects of CDS on patient outcomes.

Rationale
The Council discussed the technology requirements of the pharmacy enterprise and ASHP policies related to technology. The Council believed that one area where a gap in ASHP policy existed was in the area of clinical decision support. Current clinical decision support systems do not provide the functionality that is required in the future practice model that is envisioned by participants at the Pharmacy Practice Model Initiative (PPMI) Summit. The Council believed that ASHP should advocate for improvements in clinical decision support systems that provide actionable data analytics and support the medication-use process.

This policy was reviewed in 2018 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

1213

PHARMACIST PRESCRIBING IN INTERPROFESSIONAL PATIENT CARE

Source: Council on Pharmacy Practice

To define pharmacist prescribing as follows: patient assessment and the selection, initiation, monitoring, adjustment, and discontinuation of medication therapy pursuant to diagnosis of a medical disease or condition; further,

To advocate that health care delivery organizations establish credentialing and privileging processes that delineate the scope of pharmacist prescribing within the hospital or health system and to ensure that pharmacists who prescribe are competent and qualified to do so.

Rationale

The Pharmacy Practice Model Initiative (PPMI) Summit recommended that “[t]hrough credentialing and privileging processes, pharmacists should include in their scope of practice prescribing as part of the collaborative practice team.” (Recommendation B14) With the demand for health care growing as the nation ages and increasing concern about the shortage of primary care providers, expanding the pharmacist’s role will contribute to the overall capacity of the health care workforce to meet patients’ primary health care needs.

As pharmacist prescribing is an innovative concept, a clear, concise definition of what it means and does not mean has yet to be established. Unlike physician prescribing, which is commonly understood to be the diagnosis and treatment of diseases and conditions, various terms are currently used to describe pharmacists’ medication ordering activities, such as prescriptive authority, collaborative practice, and collaborative drug therapy management (CDTM). These differ in definition and interpretation, depending on state scope of practice laws and other factors. A standard definition of pharmacist prescribing will facilitate future discussions on the role of pharmacists in interdisciplinary health care, help delineate health care team roles, enhance collaborative patient care, and clarify the meaning of pharmacist prescribing for other health care providers.

In the proposed definition, pharmacist prescribing differs from that by other authorized prescribers and from medication therapy management (MTM) and CDTM in three significant aspects. First, prescribing by pharmacists requires active participation in the patient’s health care team or active engagement and coordination with other individual practitioners.
responsible for the patient’s care. Second, pharmacist prescribing must take place in concert
with assessment, diagnosis, and other clinical findings contributed by the patient’s other care
providers, and changes in the patient’s medication therapy must be communicated to these
individuals in a readily available and timely manner. Third, pharmacists who prescribe are
accountable to patients and to the health care team for exercising professional judgment in
pharmacotherapy and medication-use decision-making according to their defined scope of
services, as well as for the outcomes of those services. While many pharmacists may currently
order medications under protocols for MTM or CDTM, prescribing entails a higher degree of
autonomy and is a role for advanced practitioners with demonstrated competency and
expertise.

Although clinical pharmacy specialists practicing in highly focused clinical areas such as
oncology and transplant often become skilled at diagnosing and treating symptoms in their
respective patient populations, and pharmacists are prepared and qualified to interpret
medication-related clinical laboratory results, the education and training pharmacists receive in
physical assessment does not prepare or qualify them to be diagnosticians. Pharmacist
prescribing may therefore be described as interdependent, but under this interdependent
model, review, approval, and co-signature of pharmacist-prescribed medications by a licensed
independent prescriber should be unnecessary, if pharmacists are in fact accountable for
medication therapy outcomes. ASHP policy supports pharmacist authority in matters of
medication therapy, autonomy in exercising professional judgment, and accountability for
medication therapy outcomes. Patients are best served, however, when the expertise of
pharmacists is applied to therapeutic use of medicines after definitive diagnosis indicates that
medicines are the appropriate therapy.

The American Medical Association and the American Academy of Family Physicians
have
publicly and staunchly opposed any expansion of pharmacist scope of practice perceived to
encroach on the practice of medicine. Pharmacist prescribing is implicit to interdisciplinary care
delivery, however. Independent drug therapy decision-making by pharmacists in hospitals is
already common. It is often accepted and even expected by physicians. Physicians participating
in multidisciplinary teams with pharmacists come to rely on their knowledge and see an
opportunity to free themselves from tasks that can be done by another professional with
demonstrated competency and expertise. Pharmacists in specialty practices such as
anticoagulation management, solid organ transplant, and nutrition support have long
functioned in roles in which near-independent authority to manage drug therapy has resulted
in improved outcomes. In settings such as the Indian Health Service and Veterans Affairs health
systems, where access to a primary care provider is limited, care provided by pharmacists with
prescribing authority has demonstrated the benefits of this model.

Most hospitals authorize pharmacists to manage drug therapy by enacting Pharmacy
and Therapeutics Committee policies that require use of an approved medical staff protocol
and physician oversight for pharmacist-initiated orders. In practice, however, pharmacists often
manage patients’ clinical needs that cannot be appropriately treated per protocol with minimal
physician oversight. Depending on the patient, medication, and degree of trust, physicians may
colo sign such orders with only cursory review. To the extent allowed by hospital policy,
physicians often delegate therapeutic decision-making to pharmacists, secure in the trust
developed through established professional relationships and shared experiences in
successfully dealing with challenging clinical situations, rather than through formal collaborative practice agreements. Common examples of de facto pharmacist prescribing include independently managing symptoms and side effects in oncology patients, identifying and resolving drug-induced disease or problems, managing anticoagulant therapy for patients whose clinical status falls outside protocol-specified parameters, and responding to general directives to simply “fix the problem” when medication therapy is indicated.

Credentialing by individual health care organizations is a natural selection process for determining who is authorized to prescribe that avoids distinguishing pharmacists by practice setting and allows more latitude in scope of practice. The credentialing procedures to establish pharmacists’ competency to prescribe must ensure that patients receive treatment from highly qualified caregivers. In addition to verifying appropriate education, licensure, and certification, the process should include

- the same transparency and rigor applied to other prescribers,
- criteria used to measure patient care quality, and
- peer review by pharmacists and others who are authorized to prescribe.

Health care organizations should use privileging methods that establish the scope of practice and clinical services that pharmacists are authorized to provide commensurate with their demonstrated competency within an area or areas of clinical expertise. Pharmacists practicing in hospitals and health systems do not have or need privileges, such as admitting, that are not related to medication use.

Finally, interdisciplinary health professional training programs should incorporate the concept of pharmacist prescribing in a standard way.

*This policy was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.*

### 1214

**PHARMACIST’S ROLE IN ACCOUNTABLE CARE ORGANIZATIONS**

*Source: Council on Pharmacy Practice*

To recognize that pharmacist participation in collaborative health care teams improves outcomes from medication use and lowers costs; further,

To advocate to health policymakers, payers, and other stakeholders for the inclusion of pharmacists as health care providers within accountable care organizations (ACOs) and other models of integrated health care delivery; further,

To advocate that pharmacist-provided care (including care coordination services) be appropriately recognized in reimbursement models for ACOs; further,

To advocate that pharmacists be included as health care providers in demonstration projects for ACOs; further,

To encourage comparative effectiveness research and measurement of key outcomes (e.g., clinical, economic, quality, access) for pharmacist services in ACOs; further,
To encourage pharmacy leaders to develop strategic plans for positioning pharmacists in key roles within ACOs.

**Rationale**

The Affordable Care Act of 2009 encourages the formation of accountable care organizations (ACOs). Similar in concept to health maintenance organizations, these entities consist of alliances between physicians, other health care providers, and hospitals that provide comprehensive and coordinated health care to a population of patients. ACOs emphasize primary and preventive care, are provider-led, and receive reimbursement linked to increasing health care quality and lowering per capita costs. The ACO model is based on the premise that care coordinated in this manner and incentivized by a shared-risk reimbursement model will improve health care quality and slow the growth of health care spending. One significant deterrent to pharmacist participation in the fee-for-service care model, lack of provider status, is less of a barrier in the ACO model because reimbursement is tied to quality and reduced costs rather than specific services.

Integrated systems present an important opportunity for pharmacists to demonstrate their value to the quality of care. Pharmacists could contribute to the success of ACOs by providing the following patient care services:

- Developing, implementing, and monitoring patient-specific, evidence-based drug therapy as an active participant in team-based care.
- Improving transitions in care with coordinated MTM services for patients in the hospital as well as post-discharge in ambulatory clinics and physician practices.
- Monitoring the therapy of patients with multiple chronic conditions or complex medication regimens.
- Preventing and managing adverse drug events.

Although a number of ACOs have already evolved from existing disease management and medical home programs, not much is known about the elements of success for ACOs, and implementation is likely to be challenging. To establish these elements of success, pharmacists will need to be included in ACO demonstration projects and pharmacist services will need to be the subject of research on ACO effectiveness.

As pharmacists assume the expanded roles outlined in the PPMI recommendations, pharmacy leaders should use their expertise to explore innovative strategies to meet the broader goals of ACOs. This payment model is an opportunity to demonstrate how pharmacists can help these organizations reach clinical and financial performance targets set by the Centers for Medicare & Medicaid Services (CMS), i.e., improved patient results and lower health care costs. Pharmacy managers and other pharmacy leaders should prepare now to participate in emerging ACOs by developing strategic plans for positioning pharmacists in roles where their expertise can be best applied to these goals.

*This policy was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.*
1215
PHARMACIST’S ROLE IN TEAM-BASED CARE
Source: Council on Pharmacy Practice

To recognize that pharmacist participation in interprofessional health care teams as the medication-use expert increases the capacity and efficiency of teams for delivering high-quality care; further,

To advocate to policymakers, payers, and other stakeholders for the inclusion of pharmacists as care providers within team-based care; further,

To assert that pharmacists are responsible for coordinating the care they provide with that provided by other members of the health care team and are accountable to the patient and to the health care team for the outcomes of that care; further,

To urge pharmacists on health care teams to collaborate with other team members in establishing quality measures for care provided by those teams.

Rationale
The PPMI Summit recommendations are based on a growing consensus among health care providers and payers that patient-centered care by a collaborative team is the optimal model of care. A collaborative care model provides pharmacists with an opportunity to contribute their expertise in medication use to improving patient outcomes.

The pharmacy profession appears to be struggling, however, with implementation of this care model. Not unexpectedly, states appear to vary widely in the way the “team-based care” PPMI recommendations are interpreted and applied. Therefore, states currently in the process of rewriting practice acts have been challenged to find guidance on the fundamental roles and responsibilities of pharmacists in various care settings. This policy recommendation builds on concepts in ASHP policy 1114, Pharmacist Accountability for Patient Outcomes; sets the expectation for other providers that teams with pharmacists will improve the quality, safety, and efficiency of care; and supports advocacy to the broader health care community on the value of care delivery by teams that include pharmacists.

This policy was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

1216
PHARMACY TECHNICIANS
Source: Council on Public Policy

To advocate that pharmacy move toward the following model with respect to the evolving pharmacy technician workforce as the optimal approach to protecting public health and safety: (1) development and adoption of uniform state laws and regulations regarding pharmacy technicians, (2) mandatory completion of an ASHP-accredited program of education and training as a prerequisite to pharmacy technician certification, (3) mandatory certification
by the Pharmacy Technician Certification Board as a prerequisite to licensure by the state board of pharmacy, and (4) licensure of pharmacy technicians by state boards of pharmacy granting the technician permission to engage in the full scope of responsibilities authorized by the state; further,

To advocate, with respect to certification, as an interim measure until the optimal model is fully implemented, that individuals be required either (1) to have completed an ASHP-accredited program of education and training or (2) to have at least one year of full-time equivalent experience as pharmacy technicians before they are eligible to become certified; further,

To advocate that all pharmacy functions be performed under the general supervision of a licensed pharmacist and that licensed pharmacists and technicians be held accountable for the quality of pharmacy services provided.

(Note: Licensure is the process by which an agency of government grants permission to an individual to engage in a given occupation upon finding that the applicant has attained the minimal degree of competency necessary to ensure that the public health, safety, and welfare will be reasonably well protected. Certification is the process by which a nongovernmental agency or association grants recognition to an individual who has met certain predetermined qualifications specified by that agency or association.)

This policy supersedes ASHP policy 0815.

Rationale
ASHP policy 0815 was revised to advocate for licensure of pharmacy technicians in response to Recommendation D8 by the Pharmacy Practice Model Initiative (PPMI) Summit and subsequent discussion by the ASHP Board of Directors. Optimal use of pharmacy technicians will enable pharmacists to devote more time to drug therapy management. Uniformity among state laws is essential to achieve the preferred vision for practice. Moreover, requiring licensure rather than registration will enable state boards to require competency, impose disciplinary sanctions, and hold technicians accountable for their actions.

The process proposed for pharmacy technicians to achieve licensure follows the same steps outlined in policy 0815: education and training, followed by examination and certification, as prerequisites to licensure. The movement to technician licensure was essential to assure the public that the medication-use system includes individuals competent to assist pharmacists to provide and manage their medication regimens. Licensure will provide state boards with the tools necessary to provide that assurance to the public.

This policy was reviewed in 2017 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1217
COLLABORATIVE DRUG THERAPY MANAGEMENT
1218
APPROVAL OF BIOSIMILAR MEDICATIONS

This policy was superseded by ASHP policy 1409.

1219
STABLE FUNDING FOR HRSA OFFICE OF PHARMACY AFFAIRS

Source: Council on Public Policy

To advocate for a sustainable level of funding, including appropriations, sufficient to support the public health mission of the Health Resources and Services Administration (HRSA) Office of Pharmacy Affairs; further,

To support initiatives of the Office of Pharmacy Affairs, including the 340B Drug Pricing Program and innovative pharmacy service models in HRSA-funded programs; further,

To encourage research on the potential impact of any proposed fees or alternative funding sources for the Office of Pharmacy Affairs.

This policy supersedes ASHP policy 0911.

Rationale

The Office of Pharmacy Affairs (OPA) currently relies on general funding from its parent agency, HRSA, and not a line-item annual appropriation to administer the 340B Drug Discount Program. The OPA and HRSA have sought funding to establish a cost recovery (user fee) program to administer the program. The initial fee would be 0.1 percent of the total 340B drug purchases paid by participating covered entities. HRSA and OPA contend that the cost recovery fee will create a sustainable funding source to meet the demands of the existing and projected growth of the 340B program, the changing marketplace, and new statutory program requirements. There is a need for stable and sustainable funding for the OPA. A variety of funding sources should be considered, perhaps involving entities that do not participate in the 340B program. Any user fee program should include an annual review of the percentage used to determine the annual fee charged to participating entities. In addition, OPA should not be solely dependent on user fees for its program administration; some level of congressional appropriations would serve as an important to safeguard against such a dependency.

This policy was reviewed in 2017 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1220
STANDARDIZED IMMUNIZATION AUTHORITY TO IMPROVE PUBLIC HEALTH

This policy was superseded by ASHP policy 1309.
CRITERIA FOR MEDICATION USE IN GERIATRIC PATIENTS

Source: Council on Therapeutics

To support medication therapy management, including assessment of physiologic and pharmacokinetic factors, as a central component of providing safe and effective drug therapy to geriatric patients; further,

To oppose use of the Beers criteria or similar criteria by the Centers for Medicare & Medicaid Services and other accreditation and quality improvement entities as the sole indicator to assess the appropriateness of prescribing for geriatric patients based on known limitations in the evidence evaluating the association between use of medications listed in such criteria and subsequent adverse drug events; further,

To advocate for the development, refinement, and validation of new criteria that consider drug-, disease-, and patient-specific factors and demonstrate the ability to decrease the occurrence of adverse drug events in geriatric patients; further,

To support research to assess the clinical application of existing and proposed criteria, including assessment of their correlation to patient outcomes and strategies for implementation; further,

To encourage inclusion of validated criteria in clinical decision support systems and other information technologies to facilitate prescribing for geriatric patients; further,

To acknowledge that such criteria are intended as a guide and should not replace the clinical judgment of pharmacists and other clinicians.

Rationale

Criteria have been developed to identify high-risk drugs that should be avoided in geriatric patients (i.e., those 65 years of age or older) based on the potential for these therapies to cause adverse drug events that can result in falls, hospitalizations, and other incidents that lead to significant morbidity and mortality in this patient population. Those criteria include the 2002 iteration of the Beers criteria (published in 2003) and the Screening Tool of Older Persons’ Potentially Inappropriate Prescriptions, or STOPP. Although ASHP supports the intent of these criteria to prevent patient harm, safe and effective use of medications in geriatric patients requires the more thorough assessment associated with pharmacist-provided medication therapy management. ASHP opposes adoption of the Beers criteria by the Centers for Medicare & Medicaid Services (CMS) and other accreditation and quality improvement organizations as a tool to assess prescribing in the long-term care and other settings, noting concerns about the development and validation of that tool. More importantly, studies evaluating the clinical application of the 2002 iteration of the Beers criteria have not demonstrated a reduction in adverse events when that tool is used. [Note: The American Geriatric Society has published an update to the 2002 iteration of the Beers criteria (DOI: 10.1111/j.1532-5415.2012.03923.x). Although the update addressed some concerns described by the Council (e.g., removal of drugs...
no longer available), some of the criteria’s shortcomings (e.g., lack of validation) remain unresolved. In that regard, STOPP, which is based on organ systems and accounts for patients’ concomitant disease, is considered more useful. Studies evaluating STOPP, though small in number, project a favorable impact on patient outcomes. ASHP encourages additional work to develop, refine, and validate this and similar evidence-based criteria. Further, there is a need for practice-based research to evaluate the application of such criteria and inclusion of validated criteria in clinical decision support systems and other information technologies is necessary to facilitate the use of these criteria in clinical practice. Finally, these tools are intended to serve as a guide or screening tool and should not replace the clinical judgment of pharmacists and other clinicians.

This policy was reviewed in 2017 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

1222
MEDICATION ADHERENCE
Source: Council on Therapeutics

To recognize that improving medication adherence should be a key component of strategies to improve the quality and safety of patient care only when adherence improvement efforts include the following as required elements: (1) assessing the appropriateness of therapy, (2) providing patient education, and (3) ensuring patient comprehension of information necessary to support safe and appropriate use of prescribed therapies; further,

To advocate that pharmacists, because of their distinct knowledge, skills, and abilities, should take a leadership role in multidisciplinary efforts to develop, implement, monitor, and maintain effective strategies for improving medication adherence; further,

To recognize that clinicians, patients, and caregivers share accountability for the outcomes of medication therapies, and that the central role patients and their caregivers have in disease management includes responsibility for following instructions for safe and effective medication use; further,

To encourage development, evaluation, and dissemination of models that improve adherence, including those that combine existing strategies that have demonstrated effectiveness; further,

To discourage practices that inhibit education of or lead patients to decline education and clinical information regarding their medication therapy; further,

To support the development of mechanisms to document medication adherence interventions, including information technology solutions; further,

To advocate for payment models that facilitate an expanded role for pharmacists in medication adherence efforts.
**Rationale**

The need to improve medication adherence as a cornerstone of efforts to improve patient care outcomes is widely recognized. A *2010 New England Journal of Medicine* editorial issued a call to action to improve adherence based on estimates that 50 percent of all patients are non-adherent, resulting in an estimated $100 billion spent annually on avoidable hospitalizations. ASHP supports programs to improve adherence, but such efforts are not useful, and are perhaps harmful, if they fail to (1) assess the appropriateness of therapy, (2) provide patient education, and (3) ensure patient comprehension of information necessary to support safe and appropriate use of prescribed therapies. Pharmacists are the ideal clinician to lead multidisciplinary efforts to improve medication adherence based on their distinct knowledge, skills, and abilities related to drug therapy management. Other members of the multidisciplinary team could include physicians, nurses, health psychologists, and social workers. Patients and their caregivers must share accountability with clinicians for medication outcomes, including the responsibility for following instructions for safe and effective medication use. Otherwise, the results from efforts of pharmacists and other clinicians would be negligible. Some interventions to improve medication adherence have shown favorable results, but the greatest success is achieved by models that incorporate multiple strategies reinforced over time. Therefore, the development, evaluation, and dissemination of models that use multimodal approaches are encouraged. The development of information technology solutions and other mechanisms to document interventions intended to improve medication adherence are also recommended. Further, payment models that support an expanded role for pharmacists in medication adherence efforts should be pursued.

*This policy was reviewed in 2017 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.*

**1223**

**GLOBALIZATION OF CLINICAL TRIALS**

*Source: Council on Therapeutics*

To encourage the Food and Drug Administration (FDA) to use its existing authority to increase monitoring and inspection of foreign clinical trials to ensure the integrity and quality of those studies; further,

To advocate that the FDA expand its oversight of clinical trials conducted abroad by continuing to pursue innovative strategies, such as increased collaboration with foreign regulatory agencies and changes in domestic regulatory processes that support timely submission of foreign clinical trial information; further,

To encourage the FDA to establish a standardized electronic format and reporting standards that would be required for submission of data from foreign clinical trials; further,

To support the ethical treatment of patients in foreign clinical trials in accordance with international standards designed to protect human subjects; further,
To encourage public and private research to study the impact of the globalization of clinical trials on patient care.

**Rationale**

More than 80% of marketing applications for drugs approved in fiscal year 2008 were supported by data from foreign clinical trials, and more than 50% were based on data from trials that were conducted entirely outside of the United States. This trend toward the globalization of clinical trials is expected to continue because of potential benefits to drug manufacturers (e.g., decreased costs, availability of treatment-naïve patients). ASHP is concerned that limited experience with clinical trials in some countries could affect data integrity and questioned whether results from foreign clinical trials could always be generalized to patients in the United States because of differences in genetics and cultural factors (e.g., diet, use of supplements). Existing FDA authority allows for oversight of foreign clinical trials, including a requirement for mandatory reporting. However, according to the 2010 Office of Inspector General (OIG) report, *Challenges to FDA’s Ability to Monitor and Inspect Foreign Clinical Trials*, only 0.7 percent of foreign trial investigators were inspected in FY 2008 (compared to 1.9% of investigators in the United States). The FDA should increase oversight of foreign clinical trials given the potential for inconsistencies in protocol implementation and concerns about the availability and integrity of data noted in the OIG report. Development of innovative approaches to expand oversight given limited FDA resources is also encouraged. ASHP supports a recent FDA agreement with the European Medicines Agency to share information from inspections conducted by that agency and encourages the FDA to establish this type of agreement with other countries, including those whose experience with clinical trials is limited. The FDA should also explore regulatory changes that would support more timely submission of foreign clinical trial information. This recommendation is based on concern that some aspects of current regulations may encourage drug manufacturers to favor foreign clinical trials. For example, submission of an investigational new drug (IND) application triggers FDA oversight, including required submission of clinical trial protocols. Timely submission of an IND is necessary for studies conducted within the United States because it provides an exemption from interstate commerce laws, which is needed to conduct clinical trials. However, interstate commerce laws do not apply abroad. Therefore, there is no requirement or incentive for manufacturers to submit study protocols for foreign trials if they are conducted prior to the IND submission. However, results from those trials are sometimes used to support marketing applications for drug approval. While the FDA can review protocol and data from these studies retrospectively, data omissions and other factors limit the effectiveness of this approach. Earlier submission of this information would enhance the effectiveness of FDA’s oversight. Standardization and electronic submission of data from foreign clinical trials should also be encouraged, given the OIG finding that data from these trials was sometimes not available to FDA reviewers. Ethical concerns associated with foreign clinical trials, including documented lapses in informed consent, support the need for improved adherence to ethical standards for conducting clinical research, such as those described in the *International Conference on Harmonisation Tripartite Guideline for Good Clinical Practice* and other international guidelines. Finally, the FDA and private entities are encouraged to study the
potential patient care impact of the globalization of clinical trials to determine whether there is an impact even when studies are conducted appropriately.

This policy was reviewed in 2017 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

1224
TOBACCO AND TOBACCO PRODUCTS

This policy was superseded by ASHP policy 1625.

1225
BOARD CERTIFICATION FOR PHARMACISTS
Source: Section of Clinical Specialists and Scientists

To support the principle that pharmacists who practice where a pharmacy specialty has been formally recognized by the profession should become board certified in the appropriate specialty area; further,

To recognize the Board of Pharmacy Specialties (BPS) as an appropriate organization through which specialties are formally recognized and specialty pharmacy certification should occur; further,

To advocate prioritization for recognition of new specialties in those areas where sufficient numbers of postgraduate year two residency training programs are established and where adequate numbers of pharmacists are completing accredited training programs to prepare them to practice in the specialty area; further,

To advocate for standardization of credentialing eligibility and recertification requirements to include consistent requirements for advanced postgraduate residency training; further,

To promote a future vision encouraging accredited training as an eventual prerequisite for board certification; further,

To encourage BPS to be sensitive to the needs of current practitioners as prerequisites evolve; further,

To actively encourage and support the development of effective training and recertification programs that prepare specialists for certification examination and ensure the maintenance of core competencies in their area of specialization.

Rationale
As medication therapies become more complex, the need for specialized expertise increases. Some areas of health care practice evolve to the point where certification, based on formal
accredited training and psychometrically valid examination, is needed to assure the public and other health care professionals of a level of competence, quality, and consistency among specialists practicing in that field. Certification, as defined by Council on Credentialing in Pharmacy, is the process by which a nongovernmental agency or an association grants recognition to an individual who has met certain predetermined qualifications specified by that organization. Formal recognition of pharmacy specialties demonstrates the unique knowledge, skills, and abilities of pharmacists in well-defined areas of practice and provides the assurance the public and other health care professionals need.

ASHP has long recognized the value of specialty certification. ASHP has been involved in four of the six petitions to the Board of Pharmacy Specialties (BPS) requesting recognition of new pharmacy specialties. ASHP was the sole petitioning organization for two specialties, and has worked jointly with other organizations in developing two other specialties. The ASHP Long Range Vision for Pharmacy Work Force in Hospitals and Health Systems states that pharmacists who provide services in an area where specialty certification exists should be certified in that specialty, and the ASHP Supplemental Standards for Postgraduate Training require such certification of residency program directors only. More recently, the Pharmacy Practice Model Initiative (PPMI) recommended that pharmacists who provide drug therapy management should be certified through the most appropriate BPS board-certification process if such a specialty has been established (Recommendation B10).

BPS is currently the only pharmacist-certifying organization accredited by the National Commission for Certifying Agencies (NCCA). NCAA accreditation ensures very high quality standards in the professional certification industry. Although other organizations have developed an array of credentials of differing value, those credentials do not necessarily represent the recognition of a unique area of specialization and the development of processes recognized by the profession to ensure the quality of specialty practice. It is also important to distinguish the recognition of specialties within the practice of pharmacy from other multidisciplinary certifications. Although some similarities exist in the nature of such programs, they also do not represent the recognition of a unique area of specialization and the development of processes recognized by the pharmacy profession to ensure the quality of specialty practice.

The profession should be more strategic in its efforts to grow and mature new specialties. To date, the pharmacy profession has relied upon an episodic petitioning process to identify and recognize new specialties. A methodical specialty development process would prioritize recognition of areas of practice for which a sufficient number of high-quality training programs exist and would promote development of training programs in emerging areas of pharmacy specialization in advance of specialty recognition.

Eligibility requirements for Board certification vary widely among currently recognized specialties. Although it may not currently be possible to require residency training as a prerequisite for all BPS specialty certification applicants, over time postgraduate year two residency training should become the preferred prerequisite to establish consistent requirements across specialties and provide a stronger linkage between training and certification. ASHP policy currently supports the principle that accredited training is an important future prerequisite for pharmacy technicians prior to certification by the Pharmacy Technician Certification Board. This same principle that accredited training should precede
certification should also apply to specialists in our profession. It will be important for BPS to plan for this future vision and evolve requirements in a manner that is sensitive to the needs of existing practitioners.

1226
ASHP STATEMENT ON THE ROLE OF THE MEDICATION SAFETY LEADER
Source: Council on Education and Workforce Development
To approve the ASHP Statement on the Role of the Medication Safety Leader.

1227
ASHP STATEMENT ON THE PHARMACIST’S ROLE IN MEDICATION RECONCILIATION
Source: Council on Pharmacy Practice
To approve the ASHP Statement on the Pharmacist’s Role in Medication Reconciliation.

This policy was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

1228
ASHP STATEMENT ON USE OF SOCIAL MEDIA BY PHARMACY PROFESSIONALS
Source: Pharmacy Student Forum and Section of Pharmacy Informatics and Technology
To approve the ASHP Statement on Use of Social Media by Pharmacy Professionals.
2011 Policy Positions

1101
MEDICAL MARIJUANA

Source: Council on Therapeutics

To oppose state legislation that authorizes the use of medical marijuana until there is sufficient evidence to support its safety and effectiveness and a standardized product that would be subject to the same regulations as a prescription drug product; further,

To encourage research to define the therapeutically active components, effectiveness, safety, and clinical use of medical marijuana; further,

To advocate for the development of processes that would ensure standardized formulations, potency, and quality of medical marijuana products to facilitate research; further,

To encourage the Drug Enforcement Administration to eliminate barriers to medical marijuana research, including review of medical marijuana’s status as a Schedule I controlled substance, and its reclassification, if necessary to facilitate research; further,

To oppose the procurement, storage, preparation, or distribution of medical marijuana by licensed pharmacies or health care facilities for purposes other than research; further,

To oppose the smoking of marijuana in settings where smoking is prohibited; further,

To encourage continuing education that prepares pharmacists to respond to patient and clinician questions about the therapeutic and legal issues surrounding medical marijuana use.

(Note: As defined by the Congressional Research Service, the term medical marijuana refers to uses of botanical marijuana that qualify for a medical use exception under the laws of certain states and under the federal Investigational New Drug Compassionate Access Program. Botanical marijuana includes the whole or parts of the natural marijuana plant and therapeutic products derived therefrom, as opposed to drugs produced synthetically in the laboratory that replicate molecules found in the marijuana plant.)

Rationale

This policy reflects discussions by the Council on Therapeutics and the Council on Public Policy in response to a New Business Item from the 2010 ASHP House of Delegates. The councils recognized that there is some evidence supporting the effectiveness of medical marijuana to treat or ameliorate symptoms of disease, including nausea and vomiting associated with cancer or its treatment with chemotherapy, chronic pain, and lack of appetite associated with human immunodeficiency virus infection or acquired immunodeficiency syndrome. However, the extent and quality of this evidence is limited. In addition, little is known about the safety of
medical marijuana, especially related to its long-term use. The Board and House concurred with this assessment. The councils, Board, and House believed additional and well-designed research was necessary to further define the medical use of marijuana, including determination of its therapeutically active components; clinical indications and contraindications; precautions; dosing; routes of administration; adverse effects; drug-drug, drug-disease, and drug-laboratory interactions; and effectiveness compared to existing therapies. Current inconsistencies in product formulation, potency, and quality were also considered a hindrance to developing a strong evidence base. Therefore, the councils, Board, and House recommended standardizing these factors, to the extent possible, to ensure the quality and reliability of research results. The councils, Board, and House expressed significant concern that existing federal legislation and regulation, including marijuana’s classification as a Schedule I substance under the Controlled Substances Act, would remain a barrier to the necessary research. Advocacy to the Drug Enforcement Administration (DEA) to remove or minimize these barriers was recommended. The Council on Public Policy, the Board, and the House believed it was important to oppose the procurement, storage, preparation, or distribution of medical marijuana for uses other than research by pharmacies or health care facilities because those activities could jeopardize the pharmacy or facility’s registration with the DEA. Finally, the councils, Board, and House observed the need for continuing education and information about the therapeutic and legal issues on the use of medical marijuana as it continues to evolve so pharmacists are positioned to respond to patient and practitioner inquiries.

The House and Board further agreed to oppose state legislation authorizing use of medical marijuana until there is evidence to supports its safety and efficacy and a standardized product subject to the same regulations as a prescription drug product, and to oppose the smoking of marijuana where smoking is prohibited.

1102

AGRICULTURAL USE OF HORMONE AND PROHORMONE THERAPIES

Source: Council on Therapeutics

To advocate that the Food and Drug Administration and United States Department of Agriculture re-evaluate the agricultural use of hormone and prohormone therapies for purposes of animal growth promotion based on evidence demonstrating potential adverse effects on human health; further,

To encourage additional research to better define the public health impact of using hormone therapies for agricultural purposes.

Rationale

Natural (e.g., estradiol, progesterone, testosterone) and synthetic (trenbolone, zeranol, melengestrol) hormones are commonly used for growth promotion in beef cattle raised in the United States. While the European Union has banned the use of these substances for growth promotion based on safety concerns, the United States Department of Agriculture (USDA) and FDA have long supported use of these substances based on studies conducted in the 1970s. Of note, a 2002 statement from the FDA stated that the use of hormones for agricultural purposes was safe. However, recent research has raised new concerns about potential harm to human
health, including epidemiological studies demonstrating increased rates of breast cancer in women, testicular cancer and decreased fertility in men, and hormone-related developmental issues in infants and children. The Council believed that use of hormone therapies for agricultural therapies should be re-examined based on this new evidence and improved technology for measuring exposure to hormone substances that has become available since the time of the initial decision by the USDA and FDA, and the Board and House concurred. The House suggested and the Board agreed that pro-hormone therapies should be re-evaluated as well. The Council and Board also encouraged additional research to examine the public health impact of agricultural uses of hormone therapies.

This policy was reviewed in 2016 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

1103
DIRECT-TO-CONSUMER CLINICAL GENETIC TESTS
Source: Council on Therapeutics

To support research to validate and standardize genetic markers used in direct-to-consumer clinical genetic tests and guide the application of test results to clinical practice; further,

To encourage the Food and Drug Administration to use existing authority to regulate these tests as medical devices and to work with the National Institutes of Health to expedite establishment of a process to evaluate and approve direct-to-consumer clinical genetic tests; further,

To advocate that direct-to-consumer clinical genetic tests to support disease diagnosis or management of drug therapy be provided to consumers only through the services of appropriate health care professionals that order tests from laboratories that are certified under the Clinical Laboratories Improvement Amendments of 1988 (CLIA); further,

To oppose advertising of direct-to-consumer clinical genetic tests unless such testing includes the established patient-health care provider relationship as a mechanism to provide information and interpretation of test results; further,

To oppose advertising of direct-to-consumer clinical genetic tests unless the following requirements are met: (1) that the relationship between the genetic marker and the disease or condition being assessed is clearly presented, (2) that the benefits and risks of testing are discussed, and (3) that such advertising is provided in an understandable format, at a level of health literacy that allows the intended audience to make informed decisions, and includes a description of the established patient-health care provider relationship as a critical source for information about the test and interpretation of test results; further,
To encourage pharmacists to educate consumers and clinicians on the appropriate use of direct-to-consumer clinical genetic tests for disease diagnosis and drug therapy management.

**Rationale**
The Council sought to address the use of genetic testing for disease diagnosis and drug therapy management. Discussion addressed tests available in the clinical setting but focused on those available directly to the public. There was significant concern about direct-to-consumer clinical genetic tests. The July 2010 Government Accountability Office (GAO) report, *Direct-to-Consumer Genetic Tests: Misleading Test Results Are Further Complicated by Deceptive Marketing and Other Questionable Practices*, found that blood samples from the same individuals sent to different direct-to-consumer genetic testing services had significant variability in results. In many instances, this variability can be attributed to the expansive number of markers and genes, including those supported by the FDA, that have been correlated to specific diseases. In the absence of regulation or guidance on which markers are most predictive or reliable, genetic testing companies select freely from among these markers when developing tests, thus resulting in variable results. The Council encouraged additional research to determine the clinical relevance of the genetic and biomarkers used in these tests and establishment of standardized markers to assess for specific diseases and conditions, and the Board and House concurred. It was also recommended that ASHP advocate to the FDA and the National Institutes of Health (NIH) to establish a thorough process to evaluate and approve genetic testing. The Council cautioned about the accuracy and patient interpretation of these tests, which are generally provided outside the context of an established patient-health care provider relationship that includes dialog and interpretation to support decision-making. The Council, Board, and House strongly believed that these tests should only be provided in the context of that relationship and be performed only by laboratories that are CLIA certified. Further, the Council, Board, and House sought to limit direct-to-consumer advertising of these tests, based on concerns about gaps in regulatory oversight and because the relationship between test markers and disease is often unclear. In addition the Council believed that oversimplification found in many advertisements is misleading to consumers, and the Board and House agreed. Education of consumers and clinicians about use of these tests was supported by the Council, Board, and House.

*This policy was reviewed in 2016 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.*

1104

**PHARMACOGENOMICS**

*Source: Council on Therapeutics*

To advocate that pharmacists take a leadership role in the therapeutic applications of pharmacogenomics, which is essential to individualized drug therapy; further,
To support research to validate and standardize genetic markers and genetic testing for
drug therapy and to support research and other efforts that guide and accelerate the
application of pharmacogenomics to clinical practice; further,

To advocate for the inclusion of pharmacogenomic test results in medical and pharmacy
records in a format that clearly states the implications of the results for drug therapy and
facilitates availability of the genetic information throughout the continuum of care and over a
patient’s lifetime; further,

To encourage pharmacists to educate prescribers and patients about the use of
pharmacogenomic tests and their appropriate application to drug therapy management; further,

To encourage pharmacist education on the use of pharmacogenomics and advocate for
the inclusion of pharmacogenomics and its application to therapeutic decision-making in
college of pharmacy curricula.

This policy supersedes ASHP policy 0016.

Rationale
The Council reviewed ASHP policy 0016, Pharmacogenomics, as part of a larger discussion on
marketing and clinical application of genetic tests available to consumers. The Council voted
and the Board and House agreed to amend this policy to more clearly define the role of
pharmacists in pharmacogenomic testing.

This policy was reviewed in 2016 by the Council on Therapeutics and by the Board of
Directors and was found to still be appropriate.

1105
SAFE AND EFFECTIVE USE OF IV PROMETHAZINE

This policy was superseded by ASHP policy 1831.

1106
PAIN MANAGEMENT

This policy was superseded by ASHP policy 1722.

1107
PATIENT-REPORTED OUTCOMES TOOLS
Source: Council on Therapeutics
To advocate for expanded use of validated patient-reported outcomes (PRO) tools in
clinical research and direct patient care; further,
To support development of validated PRO tools that are sensitive to differences in cultural and health literacy; further,

To encourage additional research on PRO tools, including studies to assess their correlation to overall patient outcomes; further,

To educate clinicians and patients about the appropriate use of PRO tools.

**Rationale**
The Council supported expanded use of validated patient-reported outcomes (PRO) tools—assessments of patient satisfaction, health-related quality of life, or health status—in clinical research and direct patient care, and the Board and House agreed. Although PRO tools are most often applied in the research setting, the Council, Board, and House believed that their increased application in direct patient care was warranted as a mechanism to integrate the patient perspective into the assessment and management of disease. Use of PRO tools was noted as consistent with the emphasis on patient-centered care advocated by the Institute of Medicine and other quality improvement initiatives. The Council, Board, and House supported the development of validated PRO tools that account for variability in patient cultural and health literacy and encouraged research to better define the relationship between PRO measures and overall patient outcomes. The need for clinician and patient education on the appropriate use of PRO tools was noted, including the importance of instructing clinicians to select PRO tools that are validated in patient populations that are similar to the populations in which they will be used.

*This policy was reviewed in 2016 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.*

1108
**QUALITY OF PHARMACY EDUCATION AND EXPANSION OF COLLEGES OF PHARMACY**
*Source: Council on Education and Workforce Development*

To support the Accreditation Council for Pharmacy Education’s continuing role of promulgating accreditation standards and guidelines and engaging in sound accreditation processes to ensure quality in the education provided by colleges of pharmacy; further,

To acknowledge that, in addition to a robust curriculum, access to quality experiential educational sites and the availability of qualified faculty (including preceptors and specialty-trained clinical faculty) are essential determinants of the ability to expand enrollment in existing or additional colleges of pharmacy; further,

To oppose expansion of enrollment in existing or new colleges of pharmacy unless well-designed projections demonstrate that such enrollment increases are necessary to maintain a viable pharmacist workforce.

*This policy supersedes ASHP policy 0607.*
Rationale
The growth in the number and capacity of colleges of pharmacy in recent years has been remarkable. Ten years ago, when there was a severe pharmacist shortage, new colleges were welcomed to help meet the anticipated needs of the pharmacy workforce. The pharmacist shortage has now abated, but new colleges continue to be established and capacity of existing colleges expanded. This growth, along with other factors, has led to considerable difficulty for colleges of pharmacy in locating experienced faculty. There are also growing concerns about the limited number of quality experiential education sites and how future demands for training will be met. These two factors alone have raised worries about the quality of education and the readiness of new pharmacy graduates. High quality can be ensured through the existing mechanism of Accreditation Council for Pharmacy Education (ACPE) accreditation, regardless of the number of colleges and the number of students. However, this assumes rigid enforcement of ACPE’s accreditation standards and guidelines, the availability of qualified faculty and preceptors, and an adequate capacity in practice to provide the necessary experiential education.

The Council discussed the mismatch between pharmacy workforce supply and demand. Demand far exceeded supply in 2000, but growth in colleges and other factors now have supply exceeding demand. The Council discussed how there could be better planning to avoid these situations, both of which are costly to the health care system and present risks to quality and patient care. It was suggested that well-designed workforce projections might be useful in determining the need for new or expanded educational capacity.

This policy was reviewed in 2016 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

1109
RESIDENCY EQUIVALENCY
Source: Council on Education and Workforce Development

To acknowledge the distinct role of ASHP-accredited residency training in preparing pharmacists to be direct patient-care providers; further,

To recognize the importance of clinical experience in developing practitioner expertise; further,

To affirm that there are no objective means to convert or express clinical experience as equivalent to or a substitute for the successful completion of an ASHP-accredited residency.

Rationale
ASHP’s position on the need for residency-trained pharmacists is well established and described in the ASHP Long-Range Vision for the Pharmacy Workforce in Hospitals and Health Systems. It has been suggested that a way to achieve the goal of having all pharmacists in direct patient-care roles be residency trained would be to establish a process for reviewing a “portfolio” against pre-established criteria to grant a “residency equivalency.” The Council, Board, and
House concluded that both residency training and experience are important and valuable, but different, and that it would not be appropriate to create a process that attempts to convert one into the other. The intent of the goal of having all new college of pharmacy graduates who provide direct patient care residency trained by 2020 is to enhance the skills of those practitioners, and the creation of a residency equivalency process might dilute the value of that residency training and undermine achievement of the goal.

The Council, Board, and House also discussed the process used by ASHP to waive the requirement for a postgraduate year one (PGY1) residency for experienced practitioners who wish to enter a postgraduate year two (PGY2) residency directly. While this process does consider total experience in granting the waiver, and may seem to contradict the recommended policy, the applicant still completes a residency, ultimately gaining those experiences unique to residency training.

This policy was reviewed in 2016 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

1110
PHARMACY INTERNSHIPS
Source: Council on Education and Workforce Development

To encourage the National Association of Boards of Pharmacy to develop standardized pharmacy internship hour requirements that would be used uniformly by all state boards of pharmacy; further,

To support structured requirements, goals, and objectives for pharmacy internship experiences, in alignment with requirements for introductory and advanced pharmacy practice experiences; further,

To promote and expand new staffing models that foster expanded roles for pharmacy interns, providing work experiences that build upon their knowledge and help them develop as future pharmacists.

This policy supersedes ASHP policy 0802.

Rationale
The pharmacy internship requirement established by state boards of pharmacy has changed little in many states, even with the change to a six-year doctor of pharmacy curriculum. Many states allow some or all internship hour requirements to be completed as part of a student’s introductory pharmacy practice experience (IPPE) or advanced pharmacy practice experience (APPE) rotations; others require students to complete internship hours separately.

Inconsistencies in internship requirements between states have had significant implications for pharmacy residents. Pharmacy graduates from a state with minimal internship requirements might match with a residency program in a state with stringent internship requirements, sometimes delaying their eligibility for licensure until they can complete
internship requirements in their residency state. Greater standardization would prevent these issues as residents move to other states to start their programs.

Since most states do not specify the roles and duties of pharmacy interns, many work as pharmacy technicians, which may result in a good learning experience but in some cases leaves a negative impression on the student. The lack of standardized goals and objectives for internships has resulted in experiences that are highly variable. Some hospitals have chosen to enhance their internship experience by adding structure and specific goals to be achieved. While these programs are few in number, they are viewed as highly valued learning experiences for those who participate.

The requirements for IPPEs and APPEs should be considered as internship requirements are established. Each experience has a distinct role in the development and education of pharmacy students, and care should be taken to make sure that each experience is maximized and that core elements are not left out.

This policy was reviewed in 2016 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

STATE-SPECIFIC REQUIREMENTS FOR PHARMACIST CONTINUING EDUCATION

Source: Council on Education and Workforce Development

To support the standardization of state pharmacist continuing education requirements; further,

To advocate that state boards of pharmacy adopt continuing professional development (CPD) as the preferred model for maintaining pharmacist competence and structure continuing education requirements as a component of CPD.

This policy was reviewed in 2016 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

Rationale

All 50 states require continuing education for pharmacists as a means of maintaining their competence. State requirements for continuing education differ, in numbers of hours and the time frame within which they must be collected and reported, for example. Some state boards of pharmacy have established specific educational requirements for individual topic areas they concluded should be mandatory. These initially included topics such as state-specific pharmacy law and human immunodeficiency virus and acquired immune deficiency syndrome (HIV/AIDS), but more recently states have included requirements for education on medication safety, pain and palliative care, and patient management. Some states also specify the number of hours that must be obtained by “live” presentation rather than home study courses. As more states develop unique requirements, many pharmacists who are licensed in multiple states are finding it difficult to meet the unique requirements of each individual state.
In addition to continuing education required by state boards, many new Risk Evaluation and Mitigation Strategies (REMS) programs will require drug-specific education for pharmacists before they are permitted to handle or dispense the medications. The Council also discussed the limited use of CPD by pharmacists and the few states that allow CPD as part of their continuing education requirements.

1112

INNOVATIVE RESIDENCY MODELS

Source: Council on Education and Workforce Development

To support the development of innovative residency models that meet ASHP accreditation requirements.

Rationale

A growing number of residency programs have developed residency positions that are “nontraditional,” in that they do not occur in a contiguous 12-month period beginning in July and finishing the following June. Some of these innovative programs schedule the participant for one month as a resident, followed by two months as staff, with this cycle repeated over a three-year period. This allows some individuals, usually experienced individuals already on staff at the institution, to complete a residency while maintaining a more consistent work schedule and lifestyle. Some other settings have adopted a model geared toward new graduates, alternating months between residency rotation and staffing.

The concept of innovative, nontraditional residencies allows another way for established pharmacists to obtain a pharmacy residency when a conventional 12-month contiguous program is not possible. The Council, Board, and House expressed support for this model as long as ASHP accreditation standards and residency goals and objectives are utilized as they would be in a conventional program.

This policy was reviewed in 2016 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

1113

PROFESSIONAL SOCIALIZATION

Source: Council on Education and Workforce Development

To encourage pharmacists to serve as mentors to students, residents, and colleagues in a manner that fosters the adoption of: (1) high professional standards of pharmacy practice, (2) high personal standards of integrity and competence, (3) a commitment to serve humanity, (4) analytical thinking and ethical reasoning, (5) a commitment to continuing professional development, and (6) personal leadership skills.

This policy supersedes ASHP policy 0110.

Rationale

One of the most important outcomes of a successful student–preceptor relationship may be the most difficult to measure: the growth of the student as a professional through the
development of professional values such as integrity, ethics, leadership, and giving back to the community. Among the barriers that often hinder the professional socialization of students are the inadequate preparation of preceptors to do more than pass along clinical or management knowledge and the lack of a supportive environment that places value on the mentoring role of the preceptor.

Other barriers to effective professional socialization of students through their preceptors relate to declining emphasis on internship by boards of pharmacy, which in effect reduces the amount of time that the intern has with his or her preceptor, and the fact that many preceptors are not filling that role voluntarily but rather are pressured into doing so.

This policy was reviewed in 2016 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

1114
PHARMACIST ACCOUNTABILITY FOR PATIENT OUTCOMES
Source: Council on Pharmacy Practice

To affirm that pharmacists are obligated by their covenantal relationship with patients to ensure that medication use is safe and effective; further,

To declare that pharmacists, pursuant to their authority over a specialized body of knowledge, are autonomous in exercising their professional judgment and accountable as professionals and health care team members for safe and effective medication therapy outcomes; further,

To encourage pharmacists to define practices and associated measures of effectiveness that support their accountability for patient outcomes; further,

To promote pharmacist accountability as a fundamental component of pharmacy practice to other health care professionals, standards-setting and regulatory organizations, and patients.

Rationale
The Council, Board, and House agreed that a clear, succinct policy communicating the interrelationship of authority and autonomy with accountability for outcomes, good or bad, is needed. The policy should distill and define ASHP’s stance on accountability and draw on concepts implicit in current ASHP policy documents. The Council, Board, and House recognized that authority, autonomy, and accountability are inseparable components of professional practice. Without accountability, the pharmacy profession cedes the ultimate authority for decision-making in matters of medication therapy to prescribers, calling into question whether pharmacy is, in fact, a profession.

The pharmacist’s covenantal relationship with patients is described in the Pharmacist’s Oath, to which all pharmacy students profess, and which states in part:

- I will consider the welfare of humanity and relief of suffering my primary concerns.
- I will apply my knowledge, experience, and skills to the best of my ability to assure optimal outcomes for my patients.
I will embrace and advocate changes that improve patient care.

The attributes of professional status are defined by sociological, ethical, and legal expectations in literature on this subject. Those commonly cited include:

- Work is based upon the mastery of a complex body of knowledge and skills; a practice founded upon this knowledge is used in the service of others.
- Members are governed by codes of ethics and profess a commitment to competence, integrity, and ... promotion of the public good within their domain.
- A social contract exists in which, in exchange for these commitments, society recognizes the profession’s authority over the knowledge base, autonomy in practice, and the privilege of self-regulation.
- The profession’s members are accountable to those served and society.

Despite strong advocacy by pharmacy thought leaders and a wealth of evidence in its support, the precept that pharmacists are accountable for medication therapy outcomes is not widely accepted by other health care disciplines, nor is it broadly integrated into pharmacy practice. Moreover, many pharmacists may be ambivalent about assuming a role that holds them to high standards of practice and makes them answerable for the welfare of patients.

Accountability is implicit in many ASHP policy documents, most notably in the ASHP Statement on Pharmaceutical Care:

Pharmaceutical care is not a matter of formal credentials or place of work. Rather, it is a matter of a direct personal, professional, responsible relationship with a patient to ensure that the patient’s use of medication is optimal and leads to improvements in the patient’s quality of life.

The pharmacist’s authority over and expertise in use of medications are supported by the Centers for Medicare & Medicaid Services (CMS) Conditions of Participation Interpretive Guidelines, which establish a definition and expectation for pharmaceutical care:

Pharmaceutical care is defined as the direct, responsible provision of medication-related care for the purpose of achieving definite outcomes that improve a patient’s quality of life while minimizing patient risk.

The Statement on the Future Vision of Pharmacy Practice from the Joint Commission of Pharmacy Practitioners (JCPP) is explicit in its expectation for pharmacist autonomy and accountability and states in part:

How Pharmacists Will Practice. Pharmacists will have the authority and autonomy to manage medication therapy and will be accountable for patients’ therapeutic outcomes. In doing so, they will communicate and collaborate with patients, care givers, health care professionals, and qualified support personnel. As experts regarding medication use, pharmacists will be responsible for rational use of medications, including the measurement and assurance of medication therapy outcomes.... Working cooperatively with practitioners of other disciplines to care for patients, pharmacists will be ... valued
patient care providers whom health care systems and payers recognize as having responsibility for assuring the desired outcomes of medication use.

The JCPP vision statement encompasses these attributes and clearly illustrates the direction that the pharmacy profession must take. In particular, the Council, Board, and House confirmed that pharmacist accountability is a profession-defining issue that must be urgently addressed, recognizing that the policy is at most a starting point for the transformation that needs to take place in order to realize the JCPP vision.

The Council stated that unless the pharmacy profession commits to actions that translate the policy into practice, pharmacists are at risk of becoming irrelevant. As changes brought about by health care reform are implemented to add value to health care and reduce costs, the extensive training and high salaries of pharmacists cannot be justified if, as noted by the 2007 Council, “pharmacists are responsible and held accountable only for the acquisition, storage, and dispensing of medications.”

The Council called on ASHP to be fearless and persistent in promoting and establishing the JCPP vision within the profession. The Council also recommended that ASHP use its influence to create the “pull” for accountability in pharmacy practice by establishing an expectation of pharmacist accountability by other health care providers, standards-setting and regulatory organizations, and payers.

This policy was reviewed in 2016 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

1115
JUST CULTURE
Source: Council on Pharmacy Practice
To recognize that the principles of just culture promote an environment in health care organizations in which safety is valued, reporting of safety risks is encouraged, and a fair process is used to hold staff and leaders accountable; further,

To encourage hospitals and health systems to include just culture as a component in organizational safety culture surveys and quality improvement initiatives.

Rationale
The Council, Board, and House agreed that a specific ASHP policy supporting just culture principles should be developed, and that education on the topic should be an important focus for ASHP. In developing the policy, the Council reviewed principles and methods established by David Marx, a systems safety engineer and just culture educator, and noted the following (Marx, D. Whack-a-Mole: The Price We Pay for Expecting Perfection. Plano, TX: By Your Side Studios; 2009):

• The notion that humans can perform perfectly if they are well trained and continuously vigilant is unrealistic. Humans will never be perfect.
• Safe environments anticipate human error and systems are designed accordingly. However, systems will never be perfect.
• Individuals are accountable for behavioral choices that lead to error and leaders are accountable for establishing environments that encourage reporting of unsafe conditions and adverse events.
• Behaviors that cause or may cause errors are addressed regardless of whether harm occurs.
• Individual culpability for adverse events is assessed using a decision algorithm that defines attributes of behaviors and systems and can be summarized as follows:
  1. **Human error**: inadvertent; a mistake; doing other than what should have been done.
     - **Origin**: System design, processes, procedures, training.
     - **Manage by**: correcting system, supporting employee.
  2. **At-risk behavior**: behavioral choice that increases risk where risk is not recognized or is mistakenly believed to be justified.
     - **Origin**: System inefficiencies, such as steps that create rework, are burdensome, or seem irrelevant to outcome. The system incentivizes workarounds and shortcuts that are unsafe.
     - **Manage by**: Improving procedures or processes to remove incentives and reward safe behaviors.
  3. **Reckless behavior**: choosing to behave in a manner that places others at substantial and unjustifiable risk knowing that harmful outcome is likely but indifferent to it.
     - **Origin**: the individual.
     - **Manage by**: remedial action, punitive action.
  4. **Negligence**: determined by using the substitution test, i.e., would another individual in the same work area with comparable experience and qualifications have behaved any differently?

The Council identified significant advantages to this approach, one of the most important being that it encourages reporting of adverse events and provides essential information for improving systems and processes of care. In addition, holding individuals accountable by using criteria to distinguish between behaviors that do or do not merit punishment was perceived to be the fairer approach than a strictly punitive or strictly blame-free approach. Another positive attribute of *just culture* is that behaviors associated with error are handled with the appropriate responses regardless of whether harm resulted. By focusing on behaviors rather than outcomes, potential errors are averted, safe behaviors are encouraged, and at-risk or reckless behavior is not tolerated.

The Council recognized that while the *just culture* approach has been accepted by safety leaders, implementation is challenging for a number of reasons. The goals of *just culture*—to sustain a nonpunitive reporting and learning environment, yet hold individuals accountable for their behavior—seem contradictory. Methods for differentiating behaviors for which to hold an individual accountable tend to use subjective, rather than objective, criteria, and may lead to misinterpretation. Maintaining the *just culture* approach is particularly challenging under the pressure of media coverage and legal liability when a patient is harmed or dies from an error.
The belief that individual practitioners are solely responsible for their errors continues to predominate in the health care professions.

The Council noted that decision-making tools and education are available to support implementation of a *just culture*. They suggested that ASHP consider providing education and practical tools for implementing fair processes for holding individuals and leadership accountable for medication safety. Council members also characterized *just culture* as a component of the larger issue of culture of safety and proposed that assessment of *just culture* as part of assessing general safety culture should be included in ASHP’s national survey.

*This policy was reviewed in 2016 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.*

**1116**

**ETHICAL USE OF PLACEBOS IN CLINICAL PRACTICE**

*Source: Council on Pharmacy Practice*

To affirm that the use of placebos in clinical practice is ethically acceptable only when patients have been informed of and agree to such use as a component of treatment; further,

To encourage hospitals and health systems to develop policies and procedures to guide clinicians in making informed decisions regarding the use of placebos; further,

To oppose the use of pharmacologically active substances or medications as placebos.

*This policy supersedes ASHP policy 0517.*

**Rationale**

The Council reviewed previous action on ASHP policy 0517, the American Medical Association (AMA) *Opinion on Placebo Use in Clinical Practice*, and the *ASHP Guidelines on Clinical Drug Research*, which state in part:

The principal investigator or designee is responsible for obtaining informed consent from each subject who is eligible for participation in the study (i.e., meets inclusion and exclusion criteria). The informed consent process shall conform to current federal and state regulations. IRB approval of the consent form (and assent form for minors) is required. Review by legal counsel may be desirable.

After comparing use of placebos for research to prescribing for clinical use, the Council agreed with the stance expressed by AMA, i.e., patients should be informed of and agree to use of a placebo as a therapeutic intervention. The Council believed that the informed consent process should be reserved for research and medical interventions, where a consent contract and oral explanation of the patient’s rights are required. In addition, the Council expressed concern that advocating informed consent could lead to a mistaken assumption that clinical use of placebos requires the review and approval of an institutional review board.
The Council disputed the AMA definition of a placebo as “a substance provided to a patient that the physician believes has no specific pharmacological effect upon the condition being treated,” however, and recommended that a placebo should be defined as an inert substance. The Board and the House concurred. Research on placebos found differing definitions of the term but did not provide an established or official definition. The Council concluded that the current policy lacks clarity in that it addresses an undefined term. The Council requested that ASHP identify the appropriate standards-setting or regulatory body to provide this definition or determine whether ASHP should establish a definition for the purpose of its policy.

The Council noted a number of other unresolved issues that require further exploration and action by ASHP. These include research for definitive guidance on the ethics of clinical placebo use, potential ethical dilemmas for pharmacists, and compliance with professional standards and regulatory requirements for reviewing placebo orders for appropriateness, labeling placebo prescriptions, and counseling patients. The Council suggested a comprehensive review by a bioethicist be published in AJHP.

This policy was reviewed in 2016 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

1117
PHARMACISTS’ ROLE IN MEDICATION RECONCILIATION
Source: Council on Pharmacy Practice

To affirm that an effective process for medication reconciliation reduces medication errors and supports safe medication use by patients; further,

To advocate that pharmacists, because of their distinct knowledge, skills, and abilities, should take a leadership role in interdisciplinary efforts to develop, implement, monitor, and maintain effective medication reconciliation processes; further,

To encourage community-based providers, hospitals, and health systems to collaborate in organized medication reconciliation programs to promote overall continuity of patient care; further,

To declare that pharmacists have a responsibility to educate patients and caregivers on their responsibility to maintain an up-to-date and readily accessible list of medications the patient is taking and that pharmacists should assist patients and caregivers by assuring the provision of a personal medication list as part of patient counseling, education, and maintenance of an individual medical record.

This policy supersedes ASHP policy 0620.

Rationale
The Council reviewed proposed changes to The Joint Commission (TJC) national patient safety goal requiring medication reconciliation. The Council expressed support for TJC’s intent to make
the goal more achievable while continuing to support patient safety and recommended policy changes where indicated in order to align with TJC standards.

The Council noted that ASHP policy did not include an affirmation of the value of medication reconciliation in both patient care and patient safety and recommended a revision in support of the medication reconciliation process. The Council also noted that the revised goal no longer requires a list of medications, only “information on the medications the patient is taking.” The Council recommended changes in policy language that delete references to a list as an essential component of medication reconciliation and emphasize the pharmacist’s role.

Council members expressed concern that current policy language could be misinterpreted as placing sole responsibility for implementation of medication reconciliation on the pharmacy department and believed the policy should acknowledge other equally invested stakeholders in the medication-use process. The Council emphasized, however, that pharmacists are the health care professionals who should promote medication reconciliation practices that ensure good patient outcomes. They stated that pharmacy leadership in developing and guiding an organizational approach to medication reconciliation is more important than ever.

This policy was reviewed in 2016 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

1118
DRUG PRODUCT SHORTAGES

This policy was discontinued in 2016.

1119
DIRECT-TO-CONSUMER ADVERTISING OF PRESCRIPTION AND NONPRESCRIPTION MEDICATIONS

This policy was superseded by ASHP policy 1624.

1120
REGULATION OF OFF-LABEL PROMOTION AND MARKETING

This policy was superseded by ASHP policy 1620.

1121
POISON CONTROL CENTER FUNDING

Source: Council on Public Policy

To advocate that poison control centers be considered an essential emergency service; further,

To advocate for new and stable funding mechanisms for poison control centers to continue to provide these essential and valuable services; further,
To support the integration and coordination of poison control center services where appropriate.

Rationale
The Council reviewed recent trends by state governments to reduce or eliminate funding for poison control centers and concluded that ASHP policy was needed. The Board and House concurred. The Council, Board, and House agreed with observations by the American College of Emergency Physicians in its June 2010 task force report that the centers are an essential emergency service and part of the infrastructure for an all-hazards emergency preparedness system, including pandemic and bioterrorism response. The Council noted that studies have shown a positive financial benefit provided by the centers; a 2004 report by the Institute of Medicine (IOM) cited a $6.50 cost savings for every dollar invested in poison control centers.

The Council suggested that recent cuts in funding by state governments (e.g., California) as well as proposals to eliminate poison control centers in some states (e.g., New Jersey) demonstrate a need to develop new and stable funding, and the Board and House agreed. The Council further noted that the IOM report concluded that poison control centers should be better integrated and coordinated, and the Board and House agreed that such integration and coordination should be supported where appropriate.

This policy was reviewed in 2016 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1122
STATE PRESCRIPTION DRUG MONITORING PROGRAMS

This policy was superseded by ASHP policy 1408.

1123
ASHP STATEMENT ON LEADERSHIP AS A PROFESSIONAL OBLIGATION

Source: Council on Pharmacy Management
To approve the ASHP Statement on Leadership as a Professional Obligation.

This statement was reviewed in 2016 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.
2010 Policy Positions

1001
HEALTH INSURANCE COVERAGE FOR U.S. RESIDENTS

This policy was superseded by ASHP policy 2019.

1002
RISK EVALUATION AND MITIGATION STRATEGIES
Source: Council on Public Policy

To advocate for research on the impact of the Food and Drug Administration’s Risk Evaluation and Mitigation Strategies (REMS) on patient safety, cost effectiveness, and pharmacy workflow; further,

To advocate pharmacist involvement in the development and implementation of REMS; further,

To urge computer software vendors to assist pharmacists in the identification of and compliance with REMS; further,

To advocate that any REMS that include constraint on traditional drug distribution systems be consistent with ASHP policy on restricted drug distribution.

This policy was reviewed in 2015 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

Rationale
Risk Evaluation and Mitigation Strategies (REMS) are part of new authority granted to the Food and Drug Administration (FDA) to ensure that a drug’s benefits outweigh its risks. An increasing number of drug products require REMS in order to be marketed, and some REMS require Medication Guides as well as other “elements to assure safe use.” These elements beyond a Medication Guide have included prescriber and pharmacist training, patient registry, and additional patient monitoring. ASHP believes that more research should be conducted by either the FDA or drug manufacturers to determine the effectiveness of and need for REMS. Health-system pharmacists have encountered problems with REMS that were developed without input from health-system pharmacy. Pharmacist input in the development of REMS is essential to avoid unnecessary barriers to patients and burdensome interruptions to pharmacy workflow that could impact patient care and safety.

Drug information and knowledge vendors providing information technology and decision support systems will need to include gateways to specific information about REMS so that pharmacists and other health professionals have access to information about all REMS-required products and the specific requirements for a particular REMS that includes elements to assure safe use.
Finally, REMS that include constraints on traditional drug distribution systems should be consistent with existing ASHP policy on restricted drug distribution.

1003

FDA AUTHORITY ON RECALLS
Source: Council on Public Policy

To strongly encourage the Food and Drug Administration (FDA) to develop a standard recall notification process and format to be used by all manufacturers to facilitate the timely removal of recalled drugs; further,

To advocate that such notification should (1) come from a single source, (2) clearly identify the recalled product, (3) explain why the product is being recalled, (4) provide a way to report having the recalled product, (5) give instructions on what to do with the recalled product, and (6) be provided concurrently to all entities in the supply chain; further,

To advocate that the FDA be given the authority to order mandatory recalls of medications; further,

To urge the FDA to require drug manufacturers and the computer software industry to provide bar codes and data fields for lot number, expiration date, and other necessary and appropriate information on all medication packaging, including unit dose, unit-of-use, and injectable drug packaging, in order to facilitate compliance with recalls or withdrawals and to prevent the administration of recalled products to patients; further,

To urge the FDA to encourage postmarketing reporting of adverse events and product quality issues to enhance the recall system.

This policy was reviewed in 2015 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

Rationale

A recall is a manufacturer or distributor’s voluntary removal or correction of a marketed product. The Food and Drug Administration (FDA) may request a recall in “urgent situations.” For each recall, the manufacturer or distributor develops a recall strategy based upon guidance from the FDA; there is no standard format for recall notices, and communication timelines, format, content, and distribution vary.

Managing product recalls within hospitals and health systems is a complex process. Past recall events have highlighted the complexity of the process and demonstrate the need for improvements to ensure that recalled product can be removed effectively and efficiently to protect patients from inadvertent administration. During the 2008 recall of heparin, for example, 94 hospitals were found to have recalled product remaining on their shelves. Further evaluation of how the recall was implemented revealed flaws in the system. Some pharmacy departments reported that they never received the recall notice; in other cases, recalled
product was shipped to the pharmacy after the hospital had completed its review of supplies and quarantined all recalled product.

The FDA must have the authority to clearly communicate with stakeholders about recalls of marketed products. Inconsistent, unclear, and confusing information has been communicated during past recalls. A standardized recall notification process and format would enable practitioners and others in the drug distribution chain to readily identify and respond to a recall. Such a notification process should contain the following elements: a single source to designate a point of contact and control communication, clear identification of the recalled product to assist in removing the product from stock, an explanation of why the product is being recalled in order to understand the nature of the recall and communicate with patients and other stakeholders, a feedback mechanism (a reporting loop) so manufacturers and the FDA know where recalled product is located, instructions on how to return or dispose of the recalled product, and concurrent notification of all entities in the supply chain.

ASHP advocates that the FDA be given the authority to order a mandatory recall of a product to avoid the miscommunication that has occurred in past voluntary recalls. In addition, ASHP has long encouraged the FDA to require that lot number, expiration date, and other necessary information be provided electronically (e.g., by bar code or radio frequency identification) as part of the manufacturer’s information on all unit dose, unit-of-use, and injectable drug packaging.

Finally, postmarketing reporting of adverse events and product quality issues must be encouraged. Voluntary reporting will provide information for FDA to analyze to determine with the manufacturer the correct course of action.

This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1004
POSTMARKETING COMPARATIVE CLINICAL AND PHARMACOECONOMIC STUDIES

This policy was superseded by ASHP policy 2025.

1005
MEDICATION THERAPY MANAGEMENT
Source: Council on Public Policy

To support medication therapy management (MTM) services as defined in Section 3503 of the Patient Protection and Affordable Care Act (PL 111-148); further,

To affirm that MTM is a partnership between the patient (or a caregiver) and a pharmacist, in collaboration with other health care professionals, that promotes the safe and effective use of medications.

Rationale
The term "medication therapy management" (MTM) has received widespread use within the pharmacy profession and among health policymakers. The definition of MTM under Part D of
the Medicare program is significantly different from the consensus definition developed by national pharmacy organizations, including ASHP, in 2004. Provisions dealing with MTM grant programs contained in Section 3503 of the Patient Protection and Affordable Care Act (PL 111-148) (PPACA) broaden and enhance MTM beyond the Part D definition. Those provisions also refer to collaborative practice agreements as allowed by state practice acts, referred to in ASHP policy and elsewhere as "collaborative drug therapy management" (CDTM). As health care reform evolves and is implemented, it is important to recognize the distinction that state and federal laws and regulations and ASHP policy make between those two terms and to affirm ASHP’s support for the broader definition of MTM in PPACA and the central role of pharmacists in MTM.

*This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.*

1006
DEFINITION OF MEANINGFUL USE OF HEALTH INFORMATION TECHNOLOGY

*This policy was discontinued in 2020.*

1007
REGULATION OF HOME MEDICAL EQUIPMENT MEDICATION PRODUCTS AND DEVICES

*Source: Council on Public Policy*

To advocate for consistent regulatory oversight of all home medical equipment, with the goals of continuity of care, patient safety, and appropriate pharmacist involvement whenever equipment is used for medication administration; further,

To monitor the impact of the Centers for Medicare & Medicaid Services quality standards on the accreditation of suppliers of medication-related durable medical equipment and supplies.

*Rationale*

Federal and state regulation of home medical equipment (HME) and durable medical equipment (DME) suppliers creates a gap in pharmacist review and input in medication-related aspects of the services these suppliers provide to patients, particularly when a patient is discharged from the hospital to the home. The Centers for Medicare & Medicaid Services (CMS) provides conditions of participation for home health services, and states may regulate HME and DME suppliers, home health agencies, and suppliers of medical gases. Furthermore, CMS has proposed surety bond requirements for pharmacies that are also DME suppliers. The Council recommended and the Board and House agreed that ASHP should advocate for consistent regulatory oversight of these medication-related aspects so that this medication-use process ensures patient safety, improves continuity of care, and guarantees appropriate pharmacist involvement.
This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1008
EMPLOYMENT CLASSIFICATION AND DUTY HOURS OF PHARMACY RESIDENTS

Source: Council on Public Policy

To advocate that pharmacy residents should be classified as exempt employees; further,

To advocate that pharmacy residents be subject to duty hour limits (similar to resident physicians) with respect to all clinical and academic activities during their training program in accordance with the Accreditation Council on Graduate Medical Education (ACGME) standards and ASHP accreditation standards for pharmacy residency programs.

Rationale

In some states, pharmacy residents are classified as non-exempt employees (eligible for overtime pay) in accordance with guidance from state employment offices. ASHP believes that there is an important job classification distinction between pharmacists employed by a hospital or health system and pharmacy residents who are part of an organization’s residency program. Specifically, pharmacy residents are in an organized, directed, and accredited postgraduate training program that builds upon knowledge, skills, attitudes, and abilities gained from an accredited professional pharmacy-degree program. Pharmacy residents receive a salary and are subject to the same duty hours as physicians. Classifying pharmacy residents as non-exempt employees is overly burdensome and counterproductive to the residency experience and the objectives of the training program. Moreover, such misclassification could inhibit the development of an important component of the pharmacy workforce at a time of increased demand for pharmacist services as health care reform is implemented.

This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

1009
PRESERVATION OF ANTIMICROBIALS FOR MEDICAL TREATMENT

This policy was superseded by ASHP policy 1517.

1010
SAFETY AND EFFECTIVENESS OF ETHANOL FOR TREATMENT OF ALCOHOL WITHDRAWAL SYNDROME

This policy was superseded by ASHP policy 1514.

1011
USE OF SURROGATE ENDPOINTS FOR FDA APPROVAL OF DRUG USES
This policy was superseded by ASHP policy 2007.

1012
QUALITY CONSUMER MEDICATION INFORMATION

This policy was superseded by ASHP policy 1513.

1013
RESEARCH ON DRUG USE IN OBESE PATIENTS

This policy was superseded by ASHP policy 1515.

1014
INTERPROFESSIONAL EDUCATION AND TRAINING

This policy was superseded by ASHP policy 1612.

1015
MINIMUM HIRING STANDARDS FOR PHARMACY TECHNICIANS

This policy was superseded by ASHP policy 1519.

1016
PHARMACEUTICAL DISTRIBUTION SYSTEMS

This policy was superseded by ASHP policy 1707.

1017
IMPACT OF INSURANCE COVERAGE DESIGN ON PATIENT CARE DECISIONS

This policy was superseded by ASHP policy 1809.

1018
STANDARDIZATION OF DEVICE CONNECTIONS TO AVOID WRONG-ROUTE ERRORS

This policy was superseded by ASHP policy 1530.

1019
MEDICATION SAFETY OFFICER ROLE

This policy was discontinued in 2015.

1020
ROLE OF PHARMACISTS IN SAFE TECHNOLOGY IMPLEMENTATION
Source: Council on Pharmacy Practice
To affirm the essential role of the pharmacist in the evaluation, implementation, and ongoing assessment of all technology intended to ensure safety, effectiveness, and efficiency of the medication-use process.

This policy was reviewed in 2015 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

Rationale
Effective use of automation and technology solutions improves efficiency, allows more time for direct patient care, and ensures safe medication management. The Joint Commission Sentinel Event Alert published in December 2008 outlined patient safety concerns specific to technology implementation and recommended specific actions to reduce error and patient harm. The Institute for Safe Medication Practices (ISMP) has published related recommendations for specific technologies and noted recently that one drug delivery device was marketed to promote physician autonomy as a benefit of its use.

1021
JUST CULTURE AND REPORTING MEDICATION ERRORS
Source: Council on Pharmacy Practice
To encourage pharmacists to exert leadership in establishing a just culture in their workplaces and a nonpunitive systems approach to addressing medication errors while supporting a nonthreatening reporting environment to encourage pharmacy staff and others to report actual and potential medication errors in a timely manner; further,

To provide leadership in supporting a single, comprehensive, hospital- or health-system-specific medication error reporting program that (1) fosters a confidential, nonthreatening, and nonpunitive environment for the submission of medication error reports; (2) receives and analyzes these confidential reports to identify system-based causes of medication errors or potential errors; and (3) recommends and disseminates error prevention strategies; further,

To provide leadership in encouraging the participation of all stakeholders in the reporting of medication errors to this program.

(Note: A just culture is one that has a clear and transparent process for evaluating errors and separating events arising from flawed system design or inadvertent human error from those caused by reckless behavior, defined as a behavioral choice to consciously disregard what is known to be a substantial or unjustifiable risk.)

This policy was reviewed in 2015 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

Rationale
“Just culture” is an approach to medical error management that recognizes individual accountability for behavioral choices that compromise safety. The concept of “just culture” was first introduced by Sidney Dekker, a pilot and systems engineer, who recommended a different approach to the view that management of medical error should take a strict systems approach with a “no blame” attitude regarding individual accountability. David Marx, a lawyer and engineer, added additional background and recommendations, including criteria for determining whether error is “human” (i.e., inadvertent and unintended) or the result of behavioral choices that introduce risk.

“Just culture” differs from the “no blame” approach in two ways: (1) intentional actions that introduce risk or lead to error are acknowledged, and (2) an algorithm or criteria are used to determine the type of corrective action that should be taken (e.g., coaching or disciplinary action). “Just culture” has come to be accepted over the “no blame” approach because it allows the safety and health care community to address what Dekker and Marx characterize as at-risk and reckless behavior as causes of error.

1022

PATIENT ACCESS TO PHARMACY SERVICES IN SMALL AND RURAL HOSPITALS

Source: Council on Pharmacy Practice

To advocate that critical-access hospitals (CAHs) and small and rural hospitals meet national medication management and patient safety standards, regardless of size or location; further,

To provide resources and tools to assist pharmacists who provide services to CAHs and small and rural hospitals in meeting standards related to safe medication use.

This policy was reviewed in 2015 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

Rationale

Recent legislation in Texas exempts hospitals with fifty or fewer beds in remote locations from requiring prospective medication order review by a pharmacist. Pharmacist prospective order review is a well-supported safety practice that is required by the Centers for Medicare & Medicaid Services Conditions of Participation, Joint Commission accreditation standards for hospitals, and in state practice acts. Current ASHP policy supports pharmacist prospective order review and a consistent standard of care for all patients regardless of where that care is provided.

1023

SCOPE AND HOURS OF PHARMACY SERVICES

Source: Council on Pharmacy Practice

To support the principle that all patients should have 24-hour access to a pharmacist responsible for their care, regardless of hospital size or location; further,
To advocate alternative methods of pharmacist review of medication orders (such as remote review) before drug administration when onsite pharmacist review is not available; further,

To support the use of remote medication order review systems that communicate pharmacist approval of orders electronically to the hospital’s automated medication distribution system; further,

To promote the importance of pharmacist access to pertinent patient information, regardless of proximity to patient.

This policy was reviewed in 2015 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

**Rationale**

Recent legislation in Texas exempts hospitals with fifty or fewer beds in remote locations from requiring prospective medication order review by a pharmacist. Pharmacist prospective order review is a well-supported safety practice that is required by the Centers for Medicare & Medicaid Services Conditions of Participation, Joint Commission accreditation standards for hospitals, and in state practice acts. Current ASHP policy supports pharmacist prospective order review and a consistent standard of care for all patients regardless of where that care is provided.

1024

**USE OF TWO PATIENT IDENTIFIERS IN THE OUTPATIENT SETTING**

This policy was superseded by ASHP policy 2010.

1025

**ASHP STATEMENT ON BAR-CODE VERIFICATION DURING INVENTORY, PREPARATION, AND DISPENSING OF MEDICATIONS**

Source: Section of Pharmacy Informatics and Technology

To approve the ASHP Statement on Bar-code Verification During Inventory, Preparation, and Dispensing of Medications.

This statement was reviewed in 2016 by the Section of Pharmacy Informatics and Technology and by the Board of Directors and was found to still be appropriate.
0901
WORKLOAD MONITORING AND REPORTING

Source: House of Delegates Resolution

To strongly discourage the use of pharmacy workload and productivity measurement systems (“pharmacy benchmarking systems”) that are based solely upon dispensing functions (e.g., doses dispensed or billed) or a variant of patient days, because such measures do not accurately assess pharmacy workload, staffing effectiveness, clinical practice contributions to patient care, or impacts on costs of care, and therefore these measurement systems are not valid and should not be used; further,

To advocate the development and implementation of pharmacy benchmarking systems that accurately assess the impact of pharmacy services on patient outcomes and total costs of care; further,

To define pharmacy workload as all activities related to providing pharmacy patient care services; further,

To continue communications with health-system administrators, consulting firms, and professional associations regarding the value of pharmacists’ services and the importance of using valid, comprehensive, and evidence-based measures of pharmacy workload and productivity; further,

To encourage practitioners and vendors to develop and use a standard protocol for collecting and reporting pharmacy workload data and patient outcomes; further,

To advocate to health-system administrators, consulting firms, and vendors of performance-measurement services firms the development and implementation of pharmacy benchmarking systems that accurately assess the impact of pharmacy services on patient outcomes and total costs of care.

This policy was reviewed in 2019 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

Rationale

Although the practice of health-system pharmacy has evolved and changed significantly over the past two decades, benchmarking systems used to gauge the value and productivity of health-system pharmacy have remained largely unchanged. Productivity measures based solely on dispensing functions or a variant of patient days are not valid tools to assess current health-system pharmacy practice. These outdated measures do not reflect ASHP’s aspirations for health-system pharmacy (e.g., ASHP best practices and the 2015 Initiative) or evolving Joint
Commission requirements. Use of these inappropriate productivity recommendations may result in inadequate staffing, which increases stress on pharmacy leadership, discourages pharmacists from becoming pharmacy directors, and contributes to the leadership gap in health-system pharmacy.

Alternative benchmarking systems that more accurately reflect true health-system pharmacy productivity have been developed. The ASHP Section of Pharmacy Practice Managers has made recommendations for the effective use of workload and productivity systems in health-system pharmacy that elaborates the types of metrics that should be used.

0902
PHARMACIST’S ROLE IN PROVIDING CARE FOR AN AGING POPULATION
Source: Council on Pharmacy Practice
To encourage expansion of geriatric health care services; further,

To foster expanded roles for pharmacists in caring for geriatric patients; further,

To support successful innovative models of team-based, interdisciplinary geriatric care; further,

To increase training of pharmacists in caring for geriatric patients within college of pharmacy curricula, in ASHP-accredited postgraduate-year-one residencies, and through the expansion of the number of ASHP-accredited postgraduate-year-two geriatric pharmacy residency programs.

This policy was reviewed in 2019 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

Rationale
The 2008 report from the Institute of Medicine, Retooling for an Aging America: Building the Health Care Workforce, predicts a pending crisis caused by an inadequate workforce for a rapidly increasing elderly patient population and highlights issues significant for pharmacy. Although older adults currently make up only about 12% of the U.S. population, they account for approximately 26% of all physician office visits, 35% of all hospital stays, 34% of all prescriptions, 38% of all emergency medical service responses, and 90% of all nursing-home use. By 2030, the number of adults age 65 and older will have doubled to 70 million, or 20% of total population, which will place even more demands on an already undermanned workforce.

The report recommends three major immediate actions to retool the workforce: enhancing the competence of all health care practitioners in geriatric care, increasing the recruitment and retention of geriatric specialists and caregivers, and redesigning models of care to broaden provider and patient roles to achieve greater flexibility. The report discusses the significant role of pharmacists in counseling, monitoring of medication-related problems, and support of medication adherence. Many elderly people have a number of drug-related issues as well as cognitive impairment and complex needs. These factors increase the amount of expertise, time, and attention required to deliver appropriate care. The pharmacist’s role on
patient care teams and in medication therapy management will become more important with increasing numbers of frail or chronically ill patients being treated with medication. Many pharmacists may not have received sufficient training to assume this role. While professional education for pharmacists provides basic competence for medication management in the elderly, education in geriatrics may vary widely, and there are comparatively few geriatric pharmacy specialists, as only 10 programs currently offer ASHP-accredited geriatric pharmacy residency training.

0903
PHARMACEUTICAL WASTE
Source: Council on Pharmacy Practice
To collaborate with regulatory bodies and appropriate organizations to develop standards for the disposal of pharmaceutical hazardous waste as defined in the Resource Conservation and Recovery Act (RCRA), for the purpose of simplifying the disposal of these substances by health systems; further,

To encourage pharmaceutical manufacturers and the Environmental Protection Agency (EPA) to provide guidance and assistance to hospitals and health systems in proper pharmaceutical waste disposal and destruction efforts; further,

To advocate that EPA update the list of hazardous substances under RCRA and establish a process for maintaining a current list; further,

To urge federal, state, and local governments to harmonize regulations regarding disposal of hazardous pharmaceutical waste; further,

To advocate that the Food and Drug Administration standardize labeling of drug products with information relating to appropriate disposal; further,

To promote awareness within hospitals and health systems of pharmaceutical waste regulations; further,

To encourage research on the environmental and public health impacts of drug products and metabolites excreted in human waste; further,

To encourage pharmaceutical manufacturers to streamline packaging of drug products to reduce waste materials.

This policy was reviewed in 2019 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

Rationale
ASHP seeks to define pharmacists’ responsibility to the public for safe disposal of hazardous pharmaceutical waste as well as to assist with their responsibility to comply with applicable
regulations. ASHP believes that barriers to safe disposal of hazardous pharmaceutical waste include obsolete waste lists, variability in requirements, inadequate labeling, and a lack of research.

**Obsolete lists.** The waste stream for hazardous pharmaceuticals is in part determined by the RCRA waste list (i.e., P or U list) to which the drug is assigned. However, these lists do not include all medications, especially newer products. If a drug is not listed, individual organizations either follow the method of disposal listed for similar drugs or drug classes or use no special disposal method at all. Minimally hazardous drugs are included on these lists, creating needlessly burdensome disposal requirements.

**Variability in requirements.** Regulations vary from state to state and even from county to county. Large hospital systems are forced to create site-specific policies, which complicates communication and education about the appropriate management of waste.

**Labeling.** Ensuring that products for disposal are directed into the proper waste stream is left up to health care organizations. Many apply auxiliary labeling on-site to communicate this information. It would be more logical and efficient for the manufacturer to include this information in product labeling. Labeling immediate containers with disposal directions would ensure that this information reached the end-user of the product. One example of how this might be done is the method used by the National Fire Protection Agency, which identifies hazards with specific symbols.

**Research.** Little research or guidance is available on the environmental effect of hazardous metabolites excreted in human waste. More research is needed in this area.

0904
**AUTOMATIC STOP ORDERS**

This policy was superseded by ASHP policy 1405.

0905
**CREDENTIALING AND PRIVILEGING BY REGULATORS, PAYERS, AND PROVIDERS FOR COLLABORATIVE DRUG THERAPY MANAGEMENT**

This policy was superseded by ASHP policy 1907.

0907
**PHARMACEUTICAL PRODUCT AND SUPPLY CHAIN INTEGRITY**

This policy was superseded by ASHP policy 1503.

0908
**PHARMACIST ROLE IN THE HEALTH CARE (MEDICAL) HOME**

*Source: Council on Public Policy*

To advocate to health policymakers, payers, and other stakeholders for the inclusion of pharmacists as a care provider within the health care (medical) home model; further,
To ensure that there are appropriate reimbursement mechanisms for the care that pharmacists provide (including care coordination services) within the health care home model; further, 

To advocate to the Centers for Medicare & Medicaid Services that pharmacists be included in demonstration projects for the health care home model; further,

To encourage comparative effectiveness research and measurement of key outcomes (e.g., clinical, economic, quality, access) for pharmacist services in the health care home model.

This policy was reviewed in 2019 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

Rationale
The concept of a “health care home,” also referred to as a “medical home,” was first described by the American Academy of Pediatrics in 1992. The health care (medical) home model emphasizes care coordination from a medical practice and uses an interdisciplinary health care team approach to managing a patient’s overall health. A recent Medicare Payment Advisory Commission (MedPAC) report discussed a health care home program in Medicare and stated that medication reviews conducted by a health care home would ideally be coordinated by a pharmacist. As the Centers for Medicare & Medicaid Services (CMS) begins health care home demonstration projects, it is important that a pharmacist be included in the health care home model and that pharmacists be factored into the compensation for services provided. To determine the effectiveness of the care that is delivered, research and measurement of key outcomes are important elements of any demonstration or permanent delivery model.

0909
REGULATION OF INTERSTATE PHARMACY PRACTICE
Source: Council on Public Policy

To advocate that state governments, including legislatures and boards of pharmacy, adopt laws and regulations that harmonize the practice of pharmacy across state lines in order to provide a consistent, transparent, safe, and accountable framework for pharmacy practice.

This policy was reviewed in 2019 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

Rationale
With the emergence of new technology, state borders are becoming more artificial and coordination between states is increasingly needed. To achieve the highest level of patient safety possible, state regulatory bodies need to work closely together to provide a consistent and transparent regulatory framework for pharmacy practice. Dialogue between the National Association of Boards of Pharmacy and individual state boards can help harmonize the practice of pharmacy across state lines by producing model language that can be adopted by individual states.
0910
REPORTING MEDICATION ERRORS

This policy was superseded by ASHP policy 1021.

0911
STABLE FUNDING FOR OFFICE OF PHARMACY AFFAIRS

This policy was superseded by ASHP policy 1219.

0912
SAFE AND EFFECTIVE USE OF HEPARIN IN NEONATAL PATIENTS

Source: Council on Therapeutics

To support the development and use of nationally standardized concentrations of heparin when used for maintenance and flush of peripheral and central venous lines in neonatal patients; further,

To advocate that hospitals and health systems use manufacturer-prepackaged heparin flush products to improve the safe use of heparin in neonatal patients.

This policy was reviewed in 2019 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

Rationale

The preferential use of saline to maintain peripheral lines and devices in adult patients has largely become the standard of care, but use of heparin in neonates continues because of a lack of consensus and perceived and actual limitations in the evidence in published literature. However, fatal medication errors caused by the use of heparin in this patient population have brought to the forefront concern that the risks of using heparin for this purpose may outweigh the potential benefits. The ASHP Therapeutic Position Statement on the Institutional Use of 0.9% Sodium Chloride Injection to Maintain Patency of Peripheral Indwelling Intermittent Infusion Devices provides evidence for the use of sodium chloride as the preferred solution for maintaining peripheral lines in adult patients but does not address the use of sodium chloride versus heparin in patients younger than 12 years of age, because at the time of publication there was a lack of sufficient evidence regarding the effectiveness of sodium chloride solution for flushing peripheral lines or maintaining their patency in neonatal and pediatric patient populations.

ASHP’s Council on Therapeutics has reviewed evidence from evaluations of the use of 0.9% sodium chloride and heparin to maintain and flush arterial and central lines in neonatal patients and reports of medication errors that involved heparin. The advantages of saline include greater compatibility than heparin with concurrently administered drug therapies, lower product costs, fewer potential adverse drug events (e.g., heparin-induced thrombocytopenia, a rare but potentially fatal event for neonatal patients), and prevention of potential medication errors related to improper selection or dilution of heparin products.
Advantages of heparin use include extended line patency and a beneficial antithrombotic effect at the insertion site. The data are conflicting and insufficient to support the recommendation of a preferred solution for line maintenance in neonatal patients at this time. The development of standardized concentrations of heparin to decrease practice variation and the use of manufacturer-prepackaged products are the best ways to improve the safe use of heparin in neonatal patients.

0913
PHARMACY STUDENT EXPERIENCES IN MEDICALLY UNDERSERVED AREAS
Source: Council on Education and Workforce Development
To encourage colleges of pharmacy to require student learning experiences in traditionally medically underserved areas and with diverse patient populations.

This policy was reviewed in 2019 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

Rationale
Numerous reports demonstrate how pharmacy students and practice sites benefit from experiential rotations in rural and urban settings, especially in settings or areas classified as medically underserved. Students learn about the cultural, financial, language, and other challenges encountered in these settings, and these skills are often invaluable when they enter practice. In addition, a student’s exposure to a new practice area may result in more interest in such sites and provide career choices that might otherwise not have been considered.

ASHP does not support mandating rotations in these settings, since there are many ways to provide the interaction, and there are concerns about how colleges could develop an infrastructure for providing these experiences. The challenges of finding good teaching sites in these settings are formidable and include a limited number of sites, a lack of qualified preceptors, and geographic distances from the college that result in housing needs.

The Accreditation Council for Pharmacy Education currently requires colleges of pharmacy to ensure that graduates can provide patient-centered care that addresses cultural diversity. Although experiential rotations may be the most common way for students to be exposed to diverse patient populations, there are many other creative ways in which this goal is being accomplished. Some colleges, for example, require students to perform service learning projects with a focus on underserved populations.

0914
EDUCATION ABOUT PATIENT SAFETY IN THE MEDICATION-USE PROCESS

This policy was discontinued in 2014.

0915
PHARMACY EXPERTISE IN THE PREPARATION AND HANDLING OF INJECTABLE MEDICATIONS

This policy was superseded by ASHP policy 1911.
0916
CONTINUING PROFESSIONAL DEVELOPMENT

Source: Council on Education and Workforce Development

To endorse and promote the concept of continuing professional development (CPD), which involves personal self-appraisal, educational plan development, plan implementation, documentation, and evaluation; further,

To continue the development of a variety of mechanisms and tools that pharmacists can use to assess their CPD needs; further,

To encourage individual pharmacists to embrace CPD as a means of maintaining their own professional competence; further,

To encourage pharmacy managers to promote CPD as the model for ensuring the competence of their staff; further,

To collaborate with other pharmacy organizations, state boards of pharmacy, accrediting bodies, and regulatory bodies in the development of effective methods for implementing CPD; further,

To strongly support objective assessment of the impact of CPD on pharmacist competence; further,

To endorse the efforts of colleges of pharmacy and ASHP-accredited pharmacy residency programs to teach the principles, concepts, and skills of CPD.

This policy was reviewed in 2019 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

Rationale

Maintaining competence throughout one’s career is part of a professional’s obligation. Traditionally, this has been done through continuing education (CE) activities, but CE has several shortcomings. There is often no mechanism to ensure that CE is effective, since most CE activities have no summative evaluation component. (Summative evaluation takes place at the completion of a program to determine whether goals and objectives have been met.) In addition, CE programs are not usually curricular, are not always competency-directed, and tend to be content-oriented rather than skill-based. There is little evidence that CE changes practice or has an impact on patient outcomes.

Continuing professional development (CPD) is a model that addresses many of the shortcomings of the CE model. CPD differs from CE in that it is ongoing and includes the entire scope of an individual’s practice, it is often undertaken in partnership with the professional’s employer, it is practitioner-centered and self-directed, and it is intended to be outcomes-oriented. Many pharmacy professionals already assume responsibility for their professional growth and development by reflecting on their practice, recognizing needs, and seeking
educational opportunities and activities that will meet those needs. Even when these activities are not documented or reported, this process incorporates many of the principles of CPD.

CPD is a cyclical, five-step process that begins with a self-appraisal by the individual professional to determine educational needs and progresses through the development of a personal plan to meet those needs, an action phase in which the professional participates in the activities identified in the personal plan, a documentation component in which the professional keeps records of all CPD activities in which he or she participates, and an evaluation phase to determine whether the CPD needs were met, if practice has been improved, if patients have benefited, and if learning was or was not accomplished (and why). This step then feeds back into the self-appraisal stage and the cycle continues.

In the self-appraisal phase, identification of CPD needs may be accomplished through personal assessment, performance review by a manager or supervisor, an audit exercise undertaken with other professionals, or as a requirement of a professional organization or regulatory body. There are a variety of mechanisms that pharmacists can use to self-assess their CPD needs. Self-assessment is not a skill most professionals learn during their professional education and training, however. For CPD to be effective, professionals must learn this skill before entering the CPD cycle, in colleges of pharmacy and residency programs.

In the next phase, the personal plan, the professional identifies resources and actions to meet the identified CPD needs. Activities may be informal, such as study clubs, observation of a colleague’s practice, and conversations with colleagues, or they may be more formal, such as CE workshops, short courses, seminars, self-study programs, or graduate-level course work.

Whether formal or informal, managed CPD requires the documentation of participation in these activities. This documentation becomes the foundation of the professional’s CPD portfolio. Documentation of participation in formal activities is usually given by the provider, but more informal and self-directed activities, such as observation of a colleague’s practice, require the individual to establish a format for documentation in the portfolio.

In the final phase, which feeds back into self-appraisal, the professional self-evaluates, is evaluated by a manager or supervisor, enlists the aid of peers, or is evaluated by an external (e.g., regulatory) body. It is important in this phase to determine whether learning was or was not accomplished (and if not, why not) and to feed this back into the ongoing CPD cycle.

0917
PHARMACY RESIDENCY TRAINING
Source: Council on Education and Workforce Development
To continue efforts to increase the number of ASHP-accredited pharmacy residency training programs and positions available.

This policy was reviewed in 2019 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

Rationale
ASHP is committed to achieving the goal that by the year 2020 all new college of pharmacy graduates who will be providing direct patient care will be required to complete an ASHP-accredited postgraduate-year-one residency (see ASHP policy 2027). To accomplish this goal,
ASHP will need to increase the number of ASHP-accredited pharmacy residency training programs and positions.

0918

**PHARMACIST LEADERSHIP OF THE PHARMACY DEPARTMENT**

*Source: Council on Pharmacy Management*

To affirm the importance of an organizational structure in hospitals and health systems that places administrative, clinical, and operational responsibility for the pharmacy department under a pharmacist leader; further,

To affirm the role of the pharmacist leader in oversight and supervision of all pharmacy personnel; further,

To recognize the supporting role of nonpharmacists in leadership and management roles within pharmacy departments.

*This policy was reviewed in 2019 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.*

**Rationale**

The ASHP Long Range Vision for the Pharmacy Work Force in Hospitals and Health Systems sees a growing role for nonpharmacists in management and leadership positions in hospitals and health systems. Many factors are fueling this expansion, including a shortage of pharmacists, pharmacists’ salaries, and the growing complexity of the pharmacy enterprise. There are many functions in the pharmacy department that can be led or managed by nonpharmacists, including management of technological, business, or financial matters. Although nonpharmacists fill many important supporting leadership and management roles within pharmacy departments, a pharmacist should lead the pharmacy enterprise, supervise and manage all pharmacy personnel, and be responsible for the administrative, clinical, and operational functions of pharmacy departments in hospitals and health systems. Use of specialized nonpharmacist expertise will vary, depending on the size and complexity of the pharmacy enterprise. These roles will be more prevalent in large facilities and less so in small or rural facilities, where there is likely to be less specialization in pharmacy functions.

0919

**INTIMIDATING OR DISRUPTIVE BEHAVIORS**

*This policy was superseded by ASHP policy 1916.*

0920

**STANDARDIZED CLINICAL DRUG NOMENCLATURE**

*Source: Council on Pharmacy Management*

To encourage federal agencies, the pharmaceutical industry, pharmacy and medical software providers, and purveyors of clinical data repositories and drug databases to explore
the potential benefits of supplementing or modifying the National Drug Code with a coding system that can be used effectively to support patient care, research, and financial management; further,

To encourage that such a coding system encompass prescription drug products, nonprescription medications, and dietary supplements and include both active and inactive ingredients.

This policy was reviewed in 2019 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

**Rationale**

Clinical decision support systems (CDSS) in computerized provider order entry (CPOE) and pharmacy information systems have been widely used for screening drug interactions and patient allergies. For this screening to be effective, a baseline coding structure for medications must be available, and the coding system needs to include prescription and nonprescription medications, dietary supplements, and drug excipients.

The National Committee on Vital and Health Statistics (NCVHS) has recommended regulatory changes to give the Food and Drug Administration (FDA) full control over the National Drug Code (NDC). Currently, FDA controls only a portion, and manufacturers control the remainder. FDA has made recommendations for uniform standards to enable electronic prescribing (e-prescribing) in ambulatory care. During the past several years, NCVHS has focused considerable attention on the feasibility and desirability of standards to support e-prescribing and the need for standard terminology for clinical drugs to facilitate automated drug-use review and decision support for patient safety. In previous reports, NCVHS documented NDC shortcomings, most notably concern about perceived weaknesses of the current NDC database and linkage of the NDC to RxNorm concepts. NCVHS expressed the need for harmonization of terminologies to eliminate incompatibilities that impair drug utilization studies and may negatively affect patient safety. RxNorm, a standardized nomenclature for clinical drugs, is produced by the National Library of Medicine. In RxNorm, the name of a clinical drug combines its ingredients, strengths, and form. RxNorm has limitations, however; it does not identify a product’s excipients or include herbal products or nonprescription medications.

0921

**PHARMACIST’S ROLE IN HEALTH CARE INFORMATION SYSTEMS**

This policy was superseded by ASHP policy 1211.

0922

**ASHP STATEMENT ON THE PHARMACIST’S ROLE IN ANTIMICROBIAL STEWARDSHIP AND INFECTION PREVENTION AND CONTROL**

*Source: Council on Pharmacy Practice*

To approve the ASHP Statement on the Pharmacist’s Role in Antimicrobial Stewardship and Infection Prevention and Control.
This statement was reviewed in 2014 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0923

ASHP STATEMENT ON THE HEALTH-SYSTEM PHARMACIST’S ROLE IN NATIONAL HEALTH CARE QUALITY INITIATIVES

Source: Council on Pharmacy Practice

To approve the ASHP Statement on the Health-System Pharmacist’s Role in National Health Care Quality Initiatives.

This statement was reviewed in 2014 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.
2008 Policy Positions

0801
ALTERNATIVE DRUG CODING SYSTEMS

This policy was superseded by ASHP policy 0920.

0802
ROLE OF PHARMACY INTERNS

This policy was superseded by ASHP policy 1110.

0803
STANDARDIZED PHARMACY TECHNICIAN TRAINING AS A PREREQUISITE FOR CERTIFICATION

This policy was discontinued in 2013.

0804
COLLABORATION REGARDING EXPERIENTIAL EDUCATION

This policy was superseded by ASHP policy 1827.

0805
ENTRY-LEVEL DOCTOR OF PHARMACY DEGREE

This policy was discontinued in 2013.

0806
HEALTH-SYSTEM USE OF MEDICATIONS AND ADMINISTRATION DEVICES SUPPLIED DIRECTLY TO PATIENTS

This policy was superseded by ASHP policies 2032 and 2033.

0807
STANDARDIZATION OF INTRAVENOUS DRUG CONCENTRATIONS

This policy was superseded by ASHP policy 1306.

0808
DISCLOSURE OF EXCIPIENTS IN DRUG PRODUCTS

This policy was superseded by ASHP policy 1528.
0809
**MEDICATIONS DERIVED FROM BIOLOGIC SOURCES**
*This policy was discontinued in 2018.*

0810
**EDUCATION, PREVENTION, AND ENFORCEMENT CONCERNING WORKPLACE VIOLENCE**
*Source: Council on Public Policy*

To advocate that federal, state, and local governments recognize the risks and consequences of workplace violence in the pharmacy community and enact appropriate criminal penalties; further,

To collaborate with federal, state, and local law enforcement and other government authorities on methods for early detection and prevention of workplace violence; further,

To encourage all workplace environments to develop and implement a policy for pharmacy personnel that (1) educates about prevention and deterrence of workplace violence, (2) identifies escalating situations that can lead to violence and instructs employees on protection and self-defense, and (3) provides continued support and care to heal personnel who were directly or indirectly involved in an incident of workplace violence; further,

To encourage the health care community to develop and maintain a communication network to share information about incidents of potential and real workplace violence.

*This policy was reviewed in 2018 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.*

0811
**REGULATION OF DIETARY SUPPLEMENTS**
*Source: Council on Public Policy*

To advocate that Congress grant authority to the Food and Drug Administration (FDA) to (1) require that dietary supplements undergo FDA approval for evidence of safety and efficacy; (2) mandate FDA-approved dietary supplement labeling that includes disclosure of excipients; (3) mandate FDA-approved patient information materials that describe safe use in a clear, standardized format, including the potential for interaction with medications and cautions for special populations; and (4) establish and maintain an adverse-event reporting system specifically for dietary supplements, and require dietary supplement manufacturers to report suspected adverse reactions to the FDA; further,

To oppose direct-to-consumer advertising of dietary supplements unless the following criteria are met: (1) federal laws are amended to include all the requirements described above to ensure that dietary supplements are safe and effective; (2) evidence-based information regarding safety and efficacy is provided in a format that allows for informed decision-making by the consumer; (3) the advertising includes a recommendation to consult with a health care professional before initiating use; (4) any known warnings or precautions regarding dietary supplement–medication interactions or dietary supplement–disease interactions are provided
as part of the advertising; and (5) the advertising is educational in nature and includes pharmacists as a source of information.

(Note: Dietary supplement as used in this policy is defined by the Dietary Supplement Health and Education Act of 1994, as amended; 21 U.S.C. 321.)

This policy was reviewed in 2018 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0812
APPROPRIATE STAFFING LEVELS
Source: Council on Public Policy
To advocate that pharmacists at each practice site base the site’s pharmacist and technician staffing levels on patient safety considerations, taking into account factors such as (1) acuity of care, (2) breadth of services, (3) historical safety data, and (4) results of research on the relationship between staffing patterns and patient safety; further,

To advocate that regulatory bodies not mandate specific, uniform pharmacy personnel ratios but rather ensure that site-specific staffing levels optimize patient safety; further,

To encourage additional research on the relationship between pharmacy staffing patterns and patient safety.

This policy was reviewed in 2018 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0813
MEDICARE PRESCRIPTION DRUG BENEFIT
Source: Council on Public Policy
To strongly advocate a fully funded prescription drug program for eligible Medicare beneficiaries that maintains continuity of care and ensures the best use of medications; further,

To advocate that essential requirements in the program include (1) appropriate product reimbursement; (2) affordability for patients, including elimination of coverage gaps; (3) payment for indirect costs and practice expenses related to the provision of pharmacist services, based on a study of those costs; (4) appropriate coverage and payment for patient care services provided by pharmacists; (5) open access to the pharmacy provider of the patient’s choice; (6) formularies with sufficient flexibility to allow access to medically necessary drugs; and (7) well-publicized, unbiased resources to assist beneficiaries in enrolling in the most appropriate plan for their medication needs.

(Note: Fully funded means the federal government will make adequate funds available to fully cover the Medicare program’s share of prescription drug program costs; eligible means
the federal government may establish criteria by which Medicare beneficiaries qualify for the prescription drug program.)

This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0814
FEDERAL REVIEW OF ANTICOMPETITIVE PRACTICES BY DRUG PRODUCT MANUFACTURERS

This policy was superseded by ASHP policy 1818.

0815
UNIFORM STATE LAWS AND REGULATIONS REGARDING PHARMACY TECHNICIANS

This policy was superseded by ASHP policy 1216.

0816
PHARMACIST’S LEADERSHIP ROLE IN ANTICOAGULATION THERAPY MANAGEMENT

This policy was superseded by ASHP policy 1703.

0817
GENERIC SUBSTITUTION OF NARROW THERAPEUTIC INDEX DRUGS
Source: Council on Therapeutics

To support the current processes used by the Food and Drug Administration (FDA) to determine bioequivalence of generic drug products, including those with a narrow therapeutic index, and to recognize the authority of the FDA to decide if additional studies are necessary to determine equivalence; further,

To oppose a blanket restriction on generic substitution for any medication or medication class without evidence from well-designed, independent studies that demonstrate inferior efficacy or safety of the generic drug product.

This policy was reviewed in 2012 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

0818
ASHP STATEMENT ON BAR-CODE-ENABLED MEDICATION ADMINISTRATION
Source: ASHP Section of Pharmacy Informatics and Technology

To approve the ASHP Statement on Bar-Code-Enabled Medication Administration.

0819
ASHP STATEMENT ON THE ROLES AND RESPONSIBILITIES OF THE PHARMACY EXECUTIVE
Source: Council on Pharmacy Management

This statement was superseded by ASHP Policy 1532.
0820
ASHP STATEMENT ON STANDARDS-BASED PHARMACY PRACTICE IN HOSPITALS AND HEALTH SYSTEMS
Source: Council on Pharmacy Management
To approve the ASHP Statement on Standards-Based Pharmacy Practice in Hospitals and Health Systems.

This statement was reviewed in 2018 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

0821
ASHP STATEMENT ON PHARMACY SERVICES TO THE EMERGENCY DEPARTMENT
Source: Council on Pharmacy Practice
To approve the ASHP Statement on Pharmacy Services to the Emergency Department.

0822
ASHP STATEMENT ON THE PHARMACY AND THERAPEUTICS COMMITTEE AND THE FORMULARY SYSTEM
Source: Council on Pharmacy Practice
To approve the ASHP Statement on the Pharmacy and Therapeutics Committee and the Formulary System.

This statement supersedes the ASHP Statement on the Pharmacy and Therapeutics Committee dated June 1, 1992, and the ASHP Statement on the Formulary System dated June 7, 1983.

This statement was reviewed in 2012 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0823
ASHP STATEMENT ON CONFIDENTIALITY OF PATIENT HEALTH CARE INFORMATION
Source: Council on Public Policy
To approve the ASHP Statement on Confidentiality of Patient Health Care Information.

This statement was reviewed in 2014 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0824
ASHP STATEMENT ON CRITERIA FOR AN INTERMEDIATE CATEGORY OF DRUG PRODUCTS
Source: Council on Therapeutics
To approve the ASHP Statement on Criteria for an Intermediate Category of Drug Products.
This statement was reviewed in 2018 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.
0701
REQUIREMENT FOR RESIDENCY

This policy was superseded by ASHP policy 2027.

0702
PHARMACY TECHNICIAN TRAINING

This policy was superseded by ASHP policy 1519.

0703
IMAGE OF AND CAREER OPPORTUNITIES FOR HOSPITAL AND HEALTH-SYSTEM PHARMACISTS

This policy was superseded by ASHP policy 1828.

0704
RESIDENCY PROGRAMS
Source: Council on Education and Workforce Development

To strongly advocate that all pharmacy residency programs become ASHP-accredited as a means of ensuring and conveying program quality.

This policy was reviewed in 2017 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

0705
ASHP GUIDELINES, STATEMENTS, AND PROFESSIONAL POLICIES AS AN INTEGRAL PART OF THE EDUCATIONAL PROCESS

This policy was superseded by ASHP policy 1706.

0706
ADMINISTERING INJECTABLE MEDICATIONS SUPPLIED DIRECTLY TO PATIENTS

This policy was superseded by ASHP policy 0806.

0707
STANDARD DRUG ADMINISTRATION SCHEDULES
Source: Council on Pharmacy Management

To support the principle that standard medication administration times should be based primarily on optimal pharmacotherapeutics, with secondary consideration of workload, caregiver preference, patient preference, and logistical issues; further,
To encourage the development of hospital-specific or health-system-specific standard administration times through an interdisciplinary process coordinated by the pharmacy; further,

To encourage information technology vendors to adopt these principles in system design while allowing flexibility to meet site-specific patient needs.

This policy was reviewed in 2017 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

0708
PAY-FOR-PERFORMANCE REIMBURSEMENT

This policy was superseded by ASHP policy 1209.

0709
PRINCIPLES OF MANAGED CARE

This policy was discontinued in 2013.

0710
ROLE OF PHARMACISTS IN SPORTS PHARMACY AND DOPING CONTROL

This policy was superseded by ASHP policy 1305.

0711
INSTITUTIONAL REVIEW BOARDS AND INVESTIGATIONAL USE OF DRUGS
Source: Council on Pharmacy Practice

To support mandatory education and training on human subject protections and research bioethics for members of institutional review boards (IRBs), principal investigators, and all others involved in clinical research; further,

To advocate that principal investigators discuss their proposed clinical drug research with representatives of the pharmacy department before submitting a proposal to the IRB; further,

To advocate that IRBs include pharmacists as voting members; further,

To advocate that IRBs inform pharmacy of all approved clinical research involving drugs within the hospital or health system; further,

To advocate that pharmacists act as liaisons between IRBs and pharmacy and therapeutics committees in the management and conduct of clinical drug research studies; further,
To strongly support pharmacists’ management of the control and distribution of drug products used in clinical research.

This policy was reviewed in 2017 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

0712
ELECTRONIC HEALTH AND BUSINESS TECHNOLOGY AND SERVICES
Source: Council on Pharmacy Practice

To encourage pharmacists to assume a leadership role in their hospitals and health systems with respect to strategic planning for and implementation of electronic health and business technology and services; further,

To encourage hospital and health-system administrators to provide dedicated resources for pharmacy departments to design, implement, and maintain electronic health and business technology and services; further,

To advocate the inclusion of electronic health technology and telepharmacy issues and applications in college of pharmacy curricula.

This policy was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0713
TOBACCO AND TOBACCO PRODUCTS

This policy was superseded by ASHP policy 1224.

0714
RESTRICTED DRUG DISTRIBUTION

This policy was superseded by ASHP policy 1714.

0715
PATIENT ACCESS TO ORPHAN DRUG PRODUCTS

This policy was superseded by ASHP policy 1821.

0716
REGULATION OF TELEPHARMACY SERVICES

This policy was superseded by ASHP policy 1310.
0717
PERSONNEL RATIOS

This policy was superseded by ASHP policy 0812.

0718
DIRECT-TO-CONSUMER ADVERTISING OF DIETARY SUPPLEMENTS

This policy was superseded by ASHP policy 0811.

0719
FDA AUTHORITY TO PROHIBIT REUSE OF BRAND NAMES
Source: Council on Public Policy

To advocate for Food and Drug Administration authority to prohibit reuse of brand names of prescription and nonprescription drugs when any active component of the product is changed or after any other changes are made in the product that may affect its safe use.

This policy was reviewed in 2017 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0720
STANDARDIZING PREFIXES AND SUFFIXES IN DRUG PRODUCT NAMES
Source: Council on Public Policy

To collaborate with others, including the United States Pharmacopeia and the Food and Drug Administration, in standardizing and defining the meaning of prefixes and suffixes for prescription and nonprescription drugs to prevent medication errors and ensure patient safety.

This policy was reviewed in 2017 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0721
MEDICARE PRESCRIPTION DRUG BENEFIT

This policy was superseded by ASHP policy 0813.

0723
REMOVAL OF PROPOXYPHENE FROM THE MARKET

This policy was discontinued in 2012.

0724
ASHP STATEMENT ON THE ROLE OF HEALTH-SYSTEM PHARMACISTS IN PUBLIC HEALTH
Source: Council on Pharmacy Practice

To approve the ASHP Statement on the Role of Health-System Pharmacists in Public Health.
This statement was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0725

**ASHP STATEMENT ON PROFESSIONALISM**  
*Source: Council on Pharmacy Practice*  
To approve the ASHP Statement on Professionalism.

This statement was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0726

**ASHP STATEMENT ON RACIAL AND ETHNIC DISPARITIES IN HEALTH CARE**  
*Source: Council on Pharmacy Practice*  
To approve the ASHP Statement on Racial and Ethnic Disparities in Health Care.

This statement was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

2006 Policy Positions

0601

**UNIVERSAL INFLUENZA VACCINATION**  
*Source: Commission on Therapeutics*  
To advocate universal administration of influenza vaccinations to the United States population.

This policy was reviewed in 2016 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

0602

**MINIMUM EFFECTIVE DOSES**  
*Source: Commission on Therapeutics*  
To advocate that the Food and Drug Administration require manufacturers to identify minimum effective doses for medications and make this information available to health care providers.

This policy was reviewed in 2016 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

0603

**MEDICATION MANAGEMENT FOR PATIENT ASSISTANCE PROGRAMS**
This policy was superseded by ASHP policy 1521.

0604
MINIMIZING THE USE OF ABBREVIATIONS
Source: Council on Administrative Affairs
To support efforts to minimize the use of abbreviations in health care; further,
To collaborate with others in the development of a lexicon of a limited number of
standard drug name abbreviations that can be safely used in patient care.

This policy was reviewed in 2016 by the Council on Pharmacy Management and by the
Board of Directors and was found to still be appropriate.

0605
PHARMACEUTICAL DISTRIBUTION SYSTEMS

This policy was superseded by ASHP policy 1016.

0606
PHARMACIST LEADERSHIP OF THE PHARMACY DEPARTMENT

This policy was superseded by ASHP policy 0918.

0607
QUALITY OF PHARMACY EDUCATION AND EXPANSION OF COLLEGES OF PHARMACY

This policy was superseded by ASHP policy 1108.

0608
INTERDISCIPLINARY HEALTH PROFESSIONS EDUCATION

This policy was superseded by ASHP policy 1014.

0609
DIRECT-TO-CONSUMER ADVERTISING OF PRESCRIPTION AND NONPRESCRIPTION
MEDICATIONS

This policy was superseded by ASHP policy 1119.

0610
PHARMACIST’S RIGHT OF CONSCIENCE AND PATIENT’S RIGHT OF ACCESS TO THERAPY
Source: Council on Legal and Public Affairs
To recognize the right of pharmacists, as health care providers, and other pharmacy
employees to decline to participate in therapies they consider to be morally, religiously, or
ethically troubling; further,
To support the proactive establishment of timely and convenient systems by pharmacists and their employers that protect the patient’s right to obtain legally prescribed and medically indicated treatments while reasonably accommodating in a nonpunitive manner the right of conscience; further,

To support the principle that a pharmacist exercising the right of conscience must be respectful of, and serve the legitimate health care needs and desires of, the patient, and shall provide a referral without any actions to persuade, coerce, or otherwise impose on the patient the pharmacist’s values, beliefs, or objections.

This policy was reviewed in 2016 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

Rationale

ASHP affirms pharmacists’ right to decline to participate in therapies they consider to be morally, religiously, or ethically troubling but recognizes that a right of conscience must balance a pharmacist’s deeply held beliefs with his or her professional duty and the patient’s right to access legally prescribed and medically indicated treatments. To achieve this balance, systems to protect the patient’s right to timely access to therapy should be developed in advance of the presentation of a prescription to a pharmacist or other employee who might exercise the right of conscience. The right of conscience therefore creates an affirmative responsibility on the part of the pharmacist to proactively notify his or her employer about therapies of concern. In addition, a pharmacist exercising the right of conscience must respect and serve the legitimate healthcare needs and desires of the patient and must provide a referral without any actions to persuade, coerce, or otherwise impose on the patient the pharmacist’s values, beliefs, or objections. For the purposes of this policy, “referral” is defined in manner similar to that used by the American Academy of Family Physicians (Consultations, Referrals, and Transfers of Care; 2012 COD): a referral is a request from one pharmacist to another to assume responsibility for management of one or more of a patient’s specified problems, for a specified period of time, until the problem(s)’ resolution, or on an ongoing basis, and represents a temporary or partial transfer of care to another pharmacist for a particular condition. When conscience requires a pharmacist also to decline to refer the patient to a specific provider who can provide the legally prescribed and medically indicated treatment, the pharmacist should offer impartial guidance to patients about how to inform themselves regarding access to the therapy. The National Catholic Bioethics Center suggests that healthcare providers declining to refer may assist patients with accomplishing a transfer of care to another provider or institution of the patient’s choosing by providing a general list of other providers or institutions based on geographic vicinity or area of specialty, so long as the list is not developed based on the criterion of whether the providers are known or believed to offer the therapy in question. Institutions should have processes in place to ensure that the transfer of care process does not interfere with the patient’s right to obtain legally prescribed and medically indicated treatments. Any accommodations made on the basis of a pharmacist’s decision to exercise the right of conscience should be nonpunitive.
0611
REDISTRIBUTION OF UNUSED MEDICATIONS
Source: Council on Legal and Public Affairs
To advocate that any program for the return and reuse of medications comply with all federal and state laws (including laws regarding controlled substances); further,

To advocate that in order to ensure patient safety and provide an equal standard of care for all patients, such a program should include the following elements: (1) compliance with practice standards, accreditation standards, and laws related to prescription dispensing; (2) a requirement that these medications must not have been out of the possession of a licensed health care professional or his or her designee; (3) protection of the privacy of the patient for whom the prescription was originally dispensed; (4) inclusion of only those drug products that are in their original sealed packaging or in pharmacy-prepared unit-of-use packaging that is not expired and has been properly stored; (5) the presence of a system for identifying medications for the purpose of a drug recall or market withdrawal; (6) a definition of patient eligibility for participation in the program; and (7) adequate compensation of participating pharmacists for any associated costs.

This policy was reviewed in 2016 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0612
STREAMLINED LICENSURE RECIPROCITY

This policy was superseded by ASHP policy 1621.

0613
FDA AUTHORITY TO PROHIBIT REUSE OF BRAND NAMES

This policy was superseded by ASHP policy 0719.

0614
SAFE DISPOSAL OF PATIENTS’ HOME MEDICATIONS
Source: Council on Professional Affairs
To minimize the patient safety consequences and public health impact of inappropriate disposal of patients’ home medications by working collaboratively with other interested organizations to (1) develop models for patient-oriented medication disposal programs that will minimize accidental poisoning, drug diversion, and potential environmental impact, (2) advocate that the pharmaceutical industry and regulatory bodies support the development and implementation of such models, and (3) educate health professionals, regulatory bodies, and the public regarding safe disposal of unused home medications.

This policy was reviewed in 2016 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.
0615
INFLUENZA VACCINATION REQUIREMENTS TO ADVANCE PATIENT SAFETY AND PUBLIC HEALTH
Source: Council on Professional Affairs
To advocate that hospitals and health systems require health care workers to receive an annual influenza vaccination except when (1) it is contraindicated, or (2) the worker has religious objections, or (3) the worker signs an informed declination; further,

   To encourage all hospital and health-system pharmacy personnel to be vaccinated against influenza; further,

   To encourage hospital and health-system pharmacists to take a lead role in developing and implementing policies and procedures for vaccinating health care workers and in providing education on the patient safety benefits of annual influenza vaccination; further,

   To work with the federal government and others to improve the vaccine development and supply system in order to ensure a consistent and adequate supply of influenza virus vaccine.

This policy was reviewed in 2016 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0616
SAFE AND EFFECTIVE EXTEMPOREOUS COMPOUNDING
Source: Council on Professional Affairs
To affirm that extemporaneous compounding of medications, when done to meet immediate or anticipatory patient needs, is part of the practice of pharmacy and is not manufacturing; further,

   To support the principle that medications should not be extemporaneously compounded when they are commercially and readily available in the form necessary to meet patient needs; further,

   To encourage pharmacists who compound medications to use only drug substances that have been manufactured in Food and Drug Administration-approved facilities and that meet official United States Pharmacopeia (USP) compendial requirements where those exist; further,

   To support the principle that pharmacists be adequately trained and have sufficient facilities and equipment that meet technical and professional standards to ensure the quality of compounded medications; further,

   To encourage USP to develop drug monographs for commonly compounded preparations; further,
To educate prescribers and other health care professionals about the potential risks associated with the use of extemporaneously compounded preparations.

This policy was reviewed in 2016 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0617
ACCREDITATION OF COMPOUNDING FACILITIES

This policy was discontinued in 2016.

0618
ELIMINATION OF SURFACE CONTAMINATION ON VIALS OF HAZARDOUS DRUGS

This policy was superseded by ASHP policy 1615.

0619
INTEGRATED TEAM-BASED APPROACH FOR THE PHARMACY ENTERPRISE

This policy was superseded by ASHP policy 1618.

0620
PHARMACISTS’ ROLE IN MEDICATION RECONCILIATION

This policy was superseded by ASHP policy 1117.

0621
STATEMENT ON THE PHARMACIST’S ROLE IN INFORMATICS

This policy was superseded by ASHP policy 1534.
2005 Policy Positions

0501  
MANDATORY LABELING OF THE PRESENCE OF LATEX  
*Source: Section of Inpatient Care Practitioners*  
To urge the Food and Drug Administration to mandate that manufacturers of medications and medication-device combination products include labeling information on whether any component of the product, including its packaging, contains natural rubber latex.

*This policy was reviewed in 2015 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.*

0502  
HEALTH CARE QUALITY STANDARDS AND PHARMACY SERVICES  
*Source: Council on Administrative Affairs*  
To advocate that health care quality improvement programs adopt standard quality measures that are developed with the involvement of pharmacists, are evidence-based, and promote the demonstrated role of pharmacists in improving patient outcomes.

*This policy was reviewed in 2020 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.*

0503  
CRITICAL-ACCESS, SMALL, AND RURAL HOSPITALS

*This policy was superseded by ASHP policy 1022.*

0504  
PHARMACY STAFF FATIGUE AND MEDICATION ERRORS  
*Source: Council on Administrative Affairs*  
To encourage pharmacy managers to consider workload fatigue, length of shifts, and similar performance-altering factors when scheduling pharmacy staff, in order to ensure safe pharmacy practices; further,

To oppose state or federal laws or regulations that mandate or restrict work hours for pharmacy staff; further,

To support research on the effects of shift length, fatigue, and other factors on the safe practice of pharmacy.

*This policy was reviewed in 2020 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.*
0505
HEALTH-SYSTEM FACILITY DESIGN

This policy was superseded by ASHP policy 2008.

0506
ACCESSIBILITY AND AFFORDABILITY OF PHARMACEUTICALS

This policy was superseded by ASHP policy 1908.

0507
ELECTRONIC INFORMATION SYSTEMS

This policy was superseded by ASHP policy 2015.

0508
FINANCIAL MANAGEMENT SKILLS

This policy was superseded by ASHP policy 1207.

0509
DEVELOPING LEADERSHIP AND MANAGEMENT COMPETENCIES

This policy was superseded by ASHP policy 1518.

0510
COMMUNICATION AMONG HEALTH-SYSTEM PHARMACY PRACTITIONERS, PATIENTS, AND OTHER HEALTH CARE PROVIDERS

Source: Council on Educational Affairs

To foster effective communication (with appropriate attention to patients' levels of general and health literacy) among health-system pharmacy practitioners, patients, and other health care providers; further,

To develop programs to enable pharmacy students, residents, and health-system pharmacy practitioners to self-assess their levels of health literacy and general communication skills; further,

To develop methods with which pharmacy students, residents, and health-system pharmacy practitioners can assess the level of general and health literacy of patients; further,

To disseminate information about resources for students, residents, and health-system pharmacy practitioners to use in working with patients and others having specific communication needs.
This policy was reviewed in 2020 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

0511
PROFESSIONAL DEVELOPMENT

This policy was discontinued in 2010.

0512
FULL HEALTH INSURANCE COVERAGE

This policy was superseded by ASHP policy 1001.

0513
POSTMARKETING COMPARATIVE CLINICAL STUDIES

This policy was superseded by ASHP policy 1004.

0514
PREMARKETING COMPARATIVE CLINICAL STUDIES

This policy was superseded by ASHP policy 1506.

0515
POSTMARKETING SAFETY STUDIES

This policy was superseded by ASHP policy 2025.

0516
MANDATORY REGISTRY OF CLINICAL TRIALS
Source: Council on Legal and Public Affairs

To advocate disclosure of the most complete information on the safety and efficacy of drug products; further,

To advocate that the Department of Health and Human Services establish a mandatory registry for all Phase II, III, and IV clinical trials that are conducted on drugs intended for use in the United States; further,

To advocate that each clinical trial have a unique identifier; further,

To advocate that all data from registered clinical trials be posted electronically with unrestricted access, and that such posting occur (1) after Food and Drug Administration approval of the related new product but before marketing begins and (2) as soon as possible for trials completed after initial marketing.
This policy was reviewed in 2015 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0517
ETHICAL USE OF PLACEBOS

This policy was superseded by ASHP policy 1116.

0518
FUNDING, EXPERTISE, AND OVERSIGHT OF STATE BOARDS OF PHARMACY

This policy was superseded by ASHP policy 1507.

0520
FEDERAL REVIEW OF ANTICOMPETITIVE PRACTICES BY DRUG PRODUCT MANUFACTURERS

This policy was superseded by ASHP policy 1818.

0521
OPPOSITION TO CREATION OF NEW CATEGORIES OF LICENSED PERSONNEL

This policy was discontinued in 2012.

0522
NEW AND EMERGING MEDICATION ORDERING AND DISTRIBUTION SYSTEMS

This policy was discontinued in 2012.

0523
ONLINE PHARMACY AND INTERNET PRESCRIBING

This policy was superseded by ASHP policy 1529.

0524
PRUDENT PURCHASING OF PHARMACEUTICALS

This policy was discontinued in 2010.

0525
MANDATORY TABLET SPLITTING FOR COST CONTAINMENT
Source: Council on Professional Affairs
To oppose mandatory tablet splitting for cost containment in ambulatory care; further,
To encourage pharmacists, when voluntary tablet splitting is considered, to collaborate with patients, caregivers, and other health care professionals to determine whether tablet splitting is appropriate on the basis of the patient's ability to split tablets and the suitability of the medication (e.g., whether it is scored or is an extended-release product); further,

To urge pharmacists to promote dosing accuracy and patient safety by ensuring that patients are educated on how to properly split tablets; further,

To encourage further research by the United States Pharmacopeia and the Food and Drug Administration on the impact of tablet splitting on product quality.

This policy was reviewed in 2015 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0526

ASHP STATEMENT ON OVER-THE-COUNTER AVAILABILITY OF STATINS

Source: Commission on Therapeutics

To approve the ASHP Statement on the Over-the-Counter Availability of Statins.

This statement was reviewed in 2009 by the Council on Therapeutics and by the Board of Directors and was found to still be appropriate.

2004 Policy Positions

0401

PHARMACEUTICAL COUNTERFEITING

This policy was discontinued in 2019.

0402

READY-TO-USE PACKAGING FOR ALL SETTINGS

Source: Council on Professional Affairs

To advocate that pharmaceutical manufacturers provide all medications used in ambulatory care settings in unit-of-use packages; further,

To urge the Food and Drug Administration to support this goal; further,

To encourage pharmacists to adopt unit-of-use packaging for dispensing prescription medications to ambulatory patients; further,

To support continued research on the safety benefits and patient adherence associated with unit-of-use packaging and other dispensing technologies.
Note: A unit-of-use package is a container--closure system designed to hold a specific quantity of a drug product for a specific use and intended to be dispensed to a patient without any modification except for the addition of appropriate labeling.

This policy was reviewed in 2014 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0403
SCOPE AND HOURS OF PHARMACY SERVICES

This policy was superseded by ASHP policy 1023.

0404
STANDARDIZATION, AUTOMATION, AND EXPANSION OF MANUFACTURER-SPONSORED PATIENT-ASSISTANCE PROGRAMS

This policy was superseded by ASHP policy 1806.

0405
ELECTRONIC INFORMATION SYSTEMS

This policy was superseded by ASHP policy 0507.

0406
WORKLOAD MONITORING AND REPORTING

This policy was superseded by ASHP policy 0901.

0407
DOCUMENTATION OF PHARMACIST PATIENT CARE SERVICES

This policy was superseded by ASHP policy 1419.

0408
CONTINUING PROFESSIONAL DEVELOPMENT

This policy was superseded by ASHP policy 0916.

0409
CULTURAL DIVERSITY AMONG HEALTH CARE PROVIDERS

This policy was superseded by ASHP policy 1414.

0413
IMPORTATION OF PHARMACEUTICALS
This policy was superseded by ASHP policy 2012.

0414
HOME INTRAVENOUS THERAPY BENEFIT

This policy was superseded by ASHP policy 1623.

0415
ASHP STATEMENT ON THE USE OF DIETARY SUPPLEMENTS

Source: Council on Professional Affairs

To approve the ASHP Statement on the Use of Dietary Supplements.

This statement was reviewed in 2015 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.
2003 Policy Positions

0301
CONTINUITY OF CARE

This policy was superseded by ASHP policy 1208.

0302
DIETARY SUPPLEMENTS CONTAINING EPHEDRINE ALKALOIDS

This policy was discontinued in 2008.

0303
PHARMACY DRUG THEFT

Source: House of Delegates Resolution

To support the development of policies and guidelines for health-system pharmacists designed to deter drug product theft and thereby enhance both the integrity of the drug distribution chain and the safety of the workplace; further,

To encourage the development of systems that limit the diversion and abuse potential of medications, including high-cost drugs and controlled substances, and thereby reduce the likelihood that these products will be targets of theft.

This policy was reviewed in 2019 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

0304
COMPLEMENTARY OR ALTERNATIVE SUBSTANCES

This policy was superseded by the ASHP Statement on the Use of Dietary Supplements dated June 20, 2004.

0305
EXPRESSION OF THERAPEUTIC PURPOSE OF PRESCRIBING

Source: Council on Professional Affairs

To advocate that the prescriber provide or pharmacists have immediate access to the intended therapeutic purpose of prescribed medications in order to ensure safe and effective medication use.

This policy was reviewed in 2018 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.
0306
PAIN MANAGEMENT

This policy was superseded by ASHP policy 1106.

0307
PHARMACIST SUPPORT FOR DYING PATIENTS

Source: Council on Professional Affairs

To support the position that care for dying patients is part of the continuum of care that pharmacists should provide to patients; further,

To support the position that pharmacists have a professional obligation to work in a collaborative and compassionate manner with patients, family members, caregivers, and other professionals to help fulfill the patient care needs, especially the quality-of-life needs, of dying patients of all ages; further,

To support research on the needs of dying patients; further,

To provide education to pharmacists on caring for dying patients, including education on clinical, managerial, professional, and legal issues; further,

To urge the inclusion of such topics in the curricula of colleges of pharmacy.

This policy was reviewed in 2018 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0308
MACHINE-READABLE CODING AND RELATED TECHNOLOGY

This policy was superseded by the ASHP Statement on Bar-Code-Enabled Medication Administration Technology dated June 10, 2008.

0309
UNIT DOSE PACKAGING AVAILABILITY

This policy was superseded by ASHP policy 1801.

0310
TECHNICIAN-CHECKING-TECHNICIAN PROGRAMS

Source: Council on Administrative Affairs

To advocate technician-checking-technician programs (with appropriate quality control measures) in order to permit redirection of pharmacist resources to patient care activities; further,
To advocate state board of pharmacy approval of these programs.

This policy was reviewed in 2018 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

0313
PATIENT-CENTERED CARE

This policy was discontinued in 2013.

0314
CULTURAL COMPETENCE

This policy was superseded by ASHP policy 1414.

0315
PRACTICE SITES FOR COLLEGES OF PHARMACY

This policy was superseded by ASHP policy 1827.

0316
BIOLOGICAL DRUGS

This policy was superseded by ASHP policy 0809.

0318
ROLE OF LICENSING, CREDENTIALING, AND PRIVILEGING IN COLLABORATIVE DRUG THERAPY MANAGEMENT

This policy was superseded by ASHP policy 0905.

0319
DRUG PRODUCT SHORTAGES

This policy was superseded by ASHP policy 1118.

0320
RE-IMPORTATION OF PHARMACEUTICALS

This policy was superseded by ASHP policy 0413.

0323
LICENSURE FOR PHARMACY GRADUATES OF FOREIGN SCHOOLS
Source: Council on Legal and Public Affairs
To support state licensure eligibility of a pharmacist who has graduated from a pharmacy program accredited by the Accreditation Council for Pharmacy Education (ACPE) or accredited by an ACPE-recognized accreditation program.

*This policy was reviewed in 2018 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.*

0324

REGULATION OF DIETARY SUPPLEMENTS

*This policy was superseded by the ASHP Statement on the Use of Dietary Supplements dated June 20, 2004.*

0325

PUBLIC FUNDING FOR PHARMACY RESIDENCY TRAINING

*Source: Council on Legal and Public Affairs*

To support legislation and regulation that ensures public funding for accredited pharmacy residency programs consistent with the needs of the public and the profession; further,

To oppose legislation or regulation involving reimbursement levels for graduate medical education that adversely affects pharmacy residencies at a rate disproportionate to other residency programs.

*This policy was reviewed in 2018 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.*

0326

ASHP STATEMENT ON THE ROLE OF HEALTH-SYSTEM PHARMACISTS IN EMERGENCY PREPAREDNESS

*Source: ASHP Board of Directors*

To approve the ASHP Statement on the Role of Health-System Pharmacists in Emergency Preparedness.

*This policy was reviewed in 2014 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.*

0328

ASHP STATEMENT ON THE PHARMACIST’S ROLE IN THE CARE OF PATIENTS WITH HIV INFECTION

*This statement was superseded by ASHP Guidelines on Pharmacist Involvement in HIV Care dated September 17, 2015.*
0201
STAFFING FOR SAFE AND EFFECTIVE PATIENT CARE

This policy was superseded by ASHP policy 2034.

0202
PERFORMANCE IMPROVEMENT
Source: Council on Administrative Affairs

To encourage pharmacists to establish performance improvement processes within their practice settings that measure both operational and patient outcomes; further,

To encourage pharmacists to use contemporary performance improvement techniques and methods for ongoing improvement in their services; further,

To support pharmacists in their development and implementation of performance-improvement processes.

This policy was reviewed in 2017 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

0206
REIMBURSEMENT FOR UNLABELED USES OF FDA-APPROVED DRUG PRODUCTS
Source: Council on Administrative Affairs

To support third-party reimbursement for FDA-approved drug products appropriately prescribed for unlabeled uses.

This policy was reviewed in 2017 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

0207
PRODUCT REIMBURSEMENT AND PHARMACIST COMPENSATION

This policy was superseded by ASHP policy 1304.

0209
SUBSTANCE ABUSE AND CHEMICAL DEPENDENCY

This policy was discontinued in 2012.

0210
HEALTH LITERACY
This policy was superseded by ASHP policy 0510.

0211
IMAGE OF AND CAREER OPPORTUNITIES FOR PHARMACY TECHNICIANS

This policy was superseded by ASHP policy 1610.

0213
PHARMACISTS’ ROLE IN IMMUNIZATION AND VACCINES

This policy was superseded by ASHP policy 1309.

0214
IMAGE OF AND CAREER OPPORTUNITIES FOR HEALTH-SYSTEM PHARMACISTS

This policy was superseded by ASHP policy 0703.

0215
EDUCATIONAL PROGRAM RESOURCES FOR AFFILIATED STATE SOCIETIES

This policy was discontinued in 2017.

0216
RESIDENCY PROGRAMS

This policy was superseded by ASHP policy 0704.

0217
“P.D.” (PHARMACY DOCTOR) DESIGNATION FOR PHARMACISTS

This policy was discontinued in 2012.

0218
PHARMACIST RECRUITMENT AND RETENTION
Source: Council on Legal and Public Affairs
To support federal and state incentive programs for new pharmacy graduates to practice in underserved areas; further,

To provide information and educational programming on strategies used by employers for successful recruitment and retention of pharmacists and pharmacy technicians; further,

To conduct regular surveys on trends in the health-system pharmacy work force, including retention rates for pharmacists and pharmacy technicians.
This policy was reviewed in 2017 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0220
INTERMEDIATE CATEGORY OF DRUGS

This policy was discontinued in 2017.

0222
GREATER ACCESS TO LESS EXPENSIVE GENERIC DRUGS

This policy was superseded by ASHP policy 1716.

0223
FEDERAL RESEARCH ON DIETARY SUPPLEMENT LABELING

This policy was superseded by the ASHP Statement on the Use of Dietary Supplements dated June 20, 2004.

0225
COMPOUNDING VERSUS MANUFACTURING

This policy was superseded by ASHP policy 0616.

0226
PROXY/ABSENTEE BALLOTING

This policy was discontinued in 2007.

0227
PHARMACIST’S RESPONSIBILITY FOR PATIENT SAFETY

This policy was discontinued in 2012.

0228
APPROPRIATE DOSING OF MEDICATIONS IN PATIENT POPULATIONS WITH UNIQUE NEEDS

This policy was discontinued in 2018.

0229
CLINICAL INVESTIGATIONS OF DRUGS USED IN ELDERLY AND PEDIATRIC PATIENTS

This policy was superseded by ASHP policy 1723.
0230
INSTITUTIONAL REVIEW BOARDS AND INVESTIGATIONAL USE OF DRUGS

This policy was superseded by ASHP policy 0711.

0231
PHARMACEUTICAL WASTE

This policy was superseded by ASHP policy 0903.

0232
PHARMACIST’S ROLE IN DRUG PROCUREMENT, DISTRIBUTION, SURVEILLANCE, AND CONTROL
Source: Council on Professional Affairs

To affirm the pharmacist’s expertise and responsibility in the procurement, distribution, surveillance, and control of all drugs used within health systems; further,

To encourage accreditation bodies, and governmental entities to enhance patient safety by supporting the pharmacist’s role in drug procurement, distribution, surveillance, and control.

(Note: For purposes of this policy, drugs include those used by inpatients and outpatients, large- and small-volume injectables, radiopharmaceuticals, diagnostic agents including radiopaque contrast media, anesthetic gases, blood-fraction drugs, dialysis fluids, respiratory therapy drugs, biotechnologically produced drugs, investigational drugs, drug samples, drugs brought to the setting by patients or family, and other chemicals and biological substances administered to patients to evoke or enhance pharmacologic responses.)

This policy was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0233
ELECTRONIC HEALTH AND BUSINESS TECHNOLOGY AND SERVICES

This policy was superseded by ASHP policy 0712.

0234
ASHP STATEMENT ON THE PHARMACIST’S ROLE IN HOSPICE AND PALLIATIVE CARE
Source: Council on Professional Affairs

To approve the ASHP Statement on the Pharmacist's Role in Hospice and Palliative Care.

This statement was superseded by ASHP Guidelines on Pharmacist’s Role in Palliative and Hospice Care.
0235

ASHP STATEMENT ON THE ROLE OF HEALTH-SYSTEM PHARMACISTS IN EMERGENCY PREPAREDNESS

Source: ASHP Board of Directors

To approve the ASHP Statement on the Role of Health-System Pharmacists in Emergency Preparedness.

This policy was superseded by ASHP policy 0326.
2001 Policy Positions

0101
PHARMACY BENEFITS FOR THE UNINSURED
Source: Council on Administrative Affairs

To support the principle that all patients have the right to receive care from pharmacists; further,

To declare that health-system pharmacists should play a leadership role in ensuring access to pharmacists' services for indigent or low-income patients who lack insurance coverage and for patients who are underinsured; further,

To advocate better collaboration among health systems, community health centers, state and county health departments, and the federal Health Resources and Services Administration (HRSA) in identifying and addressing the needs of indigent and low-income patients who lack insurance coverage and of patients who are underinsured.

This policy was reviewed in 2016 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

0102
MEDICATION FORMULARY SYSTEM MANAGEMENT

This policy was superseded by ASHP policy 1805.

0103
GENE THERAPY

This policy was superseded by ASHP Policy 1802.

0104
PATIENT SATISFACTION

This policy was superseded by ASHP policy 1616.

0105
COMPUTERIZED PRESCRIBER ORDER ENTRY
Source: Council on Administrative Affairs

To advocate the use of computerized entry of medication orders or prescriptions by the prescriber when (1) it is planned, implemented, and managed with pharmacists' involvement, (2) such orders are part of a single, shared database that is fully integrated with the pharmacy information system and other key information system components, especially the patient's medication administration record, (3) such computerized order entry improves the safety,
efficiency, and accuracy of the medication-use process, and (4) it includes provisions for the pharmacist to review and verify the order's appropriateness before medication administration, except in those instances when review would cause a medically unacceptable delay.

_This policy was reviewed in 2016 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate._

**0107**
**NONACREDITED PHARM.D. PROGRAMS**

_This policy was discontinued in 2011._

**0108**
**NONTRADITIONAL PHARM.D. ACCESSIBILITY**

_This policy was discontinued in 2011._

**0110**
**PROFESSIONAL SOCIALIZATION**

_This policy was superseded by ASHP policy 1113._

**0112**
**PROFESSIONAL DEVELOPMENT AS A RETENTION TOOL**

*Source: Council on Educational Affairs*

To recognize that pharmacy department staff development is an essential component of staff recruitment and retention as well as quality of work life; further,

To recognize that staff development encompasses more than formal in service or external programs and includes informal learning among colleagues, mentoring, and other types of learning; further,

To strongly encourage pharmacy directors and health-system administrators to support staff development programs as an important benefit that aids in recruiting and retaining qualified practitioners; further,

To assist pharmacy directors with staff development initiatives by providing a variety of educational programs, services, and resource materials.

_This policy was reviewed in 2016 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate._

**0116**
**PATIENT ADHERENCE PROGRAMS AS PART OF HEALTH INSURANCE COVERAGE**
This policy was superseded by ASHP policy 1504.

0117
PERIODIC REEXAMINATION OF ASHP’S ORGANIZATIONAL STRUCTURE AND GOVERNING PROCESS

This policy was discontinued in 2006.

0118
STATE AFFILIATE MEMBERSHIP AND ASHP APPOINTMENTS
Source: Council on Organizational Affairs

To give consideration to ASHP members who also hold membership in their state affiliate when making appointments to ASHP councils, committees, commissions, and other appointed bodies.

This policy was reviewed in 2016 by the Commission on Affiliate Relations and by the Board of Directors and was found to still be appropriate.
0001
PHARMACY WORK FORCE

This policy was superseded by ASHP policy 0201.

0002
DRUG SHORTAGES
Source: Council on Administrative Affairs

To declare that pharmaceutical manufacturers, distributors, group purchasing organizations, and regulatory bodies, when making decisions that may create drug product shortages, should strive to prevent those decisions from compromising the quality and safety of patient care.

This policy was reviewed in 2015 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

0005
RESIDENCY TRAINING FOR PHARMACISTS WHO PROVIDE DIRECT PATIENT CARE

This policy was superseded by ASHP policy 2027.

0006
PHARMACIST CREDENTIALING

This policy was superseded by ASHP policy 1415.

0010
DISPENSING BY NONPHARMACISTS AND NONPRESCRIBERS

This policy was superseded by ASHP policy 2022.

0011
STATUTORY PROTECTION FOR MEDICATION-ERROR REPORTING

This policy was superseded by ASHP policy 1505.

0012
FDA'S PUBLIC HEALTH MISSION
Source: Council on Legal and Public Affairs

To support the Food and Drug Administration's public health mission of ensuring the safety and effectiveness of drugs, biologics, and medical devices through risk assessment,
appropriate product approval, labeling approval, manufacturing oversight, and consultation with health professionals, while deferring to state regulation and professional self-regulation on matters related to the use of drugs, biologics, and medical devices; further,

To support the allocation of sufficient federal resources to allow FDA to meet its defined public health mission; further,

To support the appointment of practicing pharmacists to FDA advisory committees as one mechanism of ensuring that decisions made by the agency incorporate the unique knowledge of the profession of pharmacy for the further benefit of the patient; further,

To support an ongoing dialogue between FDA and ASHP for the purpose of exploring ways to advocate the best use of FDA-regulated products by consumers and health care professionals.

This policy was reviewed in 2020 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0013
PATIENT'S RIGHT TO CHOOSE
Source: Council on Legal and Public Affairs
To support the right of the patient or his or her representative as allowed under state law to develop, implement, and make informed decisions regarding his or her plan of care; further,

To acknowledge that the patient's rights include being informed of his or her health status, being involved in care planning and treatment, and being able to request or refuse treatment; further,

To support the right of the patient in accord with state laws to (a) formulate advance directives and (b) have health care practitioners who comply with those directives.

This policy was reviewed in 2015 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

0016
PHARMACOGENOMICS

This policy was superseded by ASHP policy 1104.

0018
INLINE FILTERS

This policy was discontinued in 2005.
0020

DRUG NAMES, LABELING, AND PACKAGING ASSOCIATED WITH MEDICATION ERRORS

*Source: Council on Professional Affairs*

To urge drug manufacturers and FDA to involve practicing pharmacists, nurses, and physicians in decisions about drug names, labeling, and packaging to help eliminate (a) look-alike and sound-alike drug names, and (b) labeling and packaging characteristics that contribute to medication errors; further,

To inform pharmacists and others, as appropriate, about specific drug names, labeling, and packaging that have documented association with medication errors.

*This policy was reviewed in 2015 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.*

MEDICATION ERRORS AND RISK MANAGEMENT

*This policy was discontinued in 2020.*

0023

ASHP STATEMENT ON REPORTING MEDICAL ERRORS

*Source: Board of Directors*

To approve the ASHP Statement on Reporting Medical Errors.

*This statement was reviewed in 2005 by the Council on Professional Affairs and by the Board of Directors and was found to still be appropriate.*

1999 Policy Positions

9901

FOSTERING PHARMACY LEADERSHIP

*This policy was discontinued in 2014.*

9902

COMPLIANCE WITH GOVERNMENTAL PAYMENT POLICIES

*This policy was superseded by ASHP policy 1205.*

9903

OPTIMIZING THE MEDICATION-USE PROCESS

*Source: Council on Administrative Affairs*

To urge health-system pharmacists to assume leadership, responsibility, and accountability for the quality, effectiveness, and efficiency of the entire medication-use process
(including prescribing, dispensing, administration, monitoring, and education) across the continuum of care; further,

To urge health-system pharmacists to work in collaboration with patients, prescribers, nurses, and other health care providers in improving the medication-use process.

This policy was reviewed in 2019 by the Council on Pharmacy Management and by the Board of Directors and was found to still be appropriate.

9904
EMERGENCY PREPAREDNESS

This policy was superseded by the ASHP Statement on the Role of Health-System Pharmacists in Emergency Preparedness dated June 1, 2003.

9905
DIVERSIFYING PHARMACEUTICAL SERVICES

This policy was discontinued in 2004.

9908
PHARMACISTS’ ROLE IN DRUG PROCUREMENT, DISTRIBUTION, AND CONTROL

This policy was superseded by ASHP policy 0232.

9911
PHARMACY RESIDENCY TRAINING

This policy was superseded by ASHP policy 0917.

9915
ASHP POSITION ON ASSISTED SUICIDE

This policy was superseded by ASHP policy 1704.

9916
PHARMACIST DECISION-MAKING ON ASSISTED SUICIDE

Source: Council on Legal and Public Affairs

To approve the ASHP Statement on Pharmacist Decision-making on Assisted Suicide.

This statement was reviewed in 2014 by the Council on Pharmacy Practice and by the ASHP Board of Directors and was found to still be appropriate.
CONFIDENTIALITY OF PATIENT HEALTH CARE INFORMATION

This statement was superseded by the ASHP Statement on Confidentiality of Patient Health Care Information dated June 10, 2008.

MANAGEMENT OF BLOOD PRODUCTS AND DERIVATIVES

This policy was discontinued in 2014.

TELEPHARMACY

This policy was discontinued in 2019.

PHARMACIST VALIDATION OF INFORMATION RELATED TO MEDICATIONS

This policy was discontinued in 2019.

PHARMACIST’S ROLE IN PRIMARY CARE
Source: Council on Professional Affairs

To approve the ASHP Statement on the Pharmacist's Role in Primary Care.

1998 Policy Positions

COLLABORATIVE DRUG THERAPY MANAGEMENT ACTIVITIES

This policy was discontinued in 2018.

CONSCIENTIOUS OBJECTION BY PHARMACISTS TO MORALLY, RELIGIOUSLY, OR ETHICALLY TROUBLING THERAPIES

This policy was superseded by ASHP policy 0610.

MEDICATION FORMULARY SYSTEM MANAGEMENT

This policy was superseded by ASHP policy 0102.
9804
MULTIDISCIPLINARY ACTION PLANS FOR PATIENT CARE

This policy was discontinued in 2013.

9805
MEDICATION MISADVENTURES

This policy was discontinued in 2019.

9806
ELECTRONIC ENTRY OF MEDICATION ORDERS

This policy was superseded by ASHP policy 0105.

9808
DEFINING AND MEASURING THE QUALITY OF CLINICAL SERVICES

This policy was superseded by ASHP policy 0202.

9810
RELATIONSHIP BETWEEN PRACTICE SITES AND EDUCATIONAL INSTITUTIONS

This policy was superseded by ASHP policy 0315.

9811
PUBLIC FUNDING FOR PHARMACY RESIDENCY TRAINING

This policy was superseded by ASHP policy 0325.

9812
COLLABORATIVE DRUG THERAPY MANAGEMENT

This policy was superseded by ASHP policy 1217.

9813
REGULATION OF AUTOMATED DRUG DISTRIBUTION SYSTEMS

Source: Council on Legal and Public Affairs

To work with the Drug Enforcement Administration and other agencies to seek regulatory and policy changes to accommodate automated drug distribution in health systems.

This policy was reviewed in 2018 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.
9814
EDUCATING PHARMACISTS TO PROVIDE APPROPRIATE SUPPORT FOR DYING PATIENTS

This policy was superseded by ASHP policy 0307.

9816
APPROPRIATE PHARMACY SUPPORT FOR DYING PATIENTS

This policy was superseded by ASHP policy 0307.

9819
ROLE OF PHARMACISTS AND BUSINESS LEADERS IN HEALTH CARE SERVICES AND POLICIES

This policy was discontinued in 2018.

9820
MEDICATION ADMINISTRATION BY PHARMACISTS
Source: Council on Professional Affairs

To support the position that the administration of medicines is part of the routine scope of pharmacy practice; further,

To support the position that pharmacists who administer medicines should be skilled to do so; further,

To support the position that pharmacists should be participants in establishing procedures in their own work settings with respect to the administration of medicines (by anyone) and monitoring the outcomes of medication administration.

This policy was reviewed in 2018 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

9821
ASHP STATEMENT ON THE PHARMACIST’S ROLE IN CLINICAL PHARMACOKINETIC MONITORING
Source: Council on Professional Affairs

To approve the ASHP Statement on the Pharmacist’s Role in Clinical Pharmacokinetic Monitoring.

This statement was reviewed in 2014 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

9822
ASHP STATEMENT ON THE PHARMACIST’S ROLE IN INFECTION CONTROL
Source: Council on Professional Affairs
To approve the ASHP Statement on the Pharmacist’s Role in Infection Control.

This policy was superseded by ASHP policy 0922.

1997 Policy Positions

9702
DRUG SAMPLES
Source: Council on Legal and Public Affairs

To oppose drug sampling or similar drug marketing programs that (1) do not provide the elements of pharmaceutical care, (2) result in poor drug control, allowing patients to receive improperly labeled and packaged, deteriorated, outdated, and unrecorded drugs, (3) provide access to prescription drugs by unauthorized, untrained personnel, (4) may encourage inappropriate prescribing habits, or (5) may increase the cost of treatment for all patients.

This policy was reviewed in 2017 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

9703
MANUFACTURER-SPONSORED PATIENT-ASSISTANCE PROGRAMS

This policy was superseded by ASHP policy 1420.

9705
PHARMACIST EDUCATION OF CONSUMERS

This policy was discontinued in 2002.

9707
PEDiatric DOSAGE FORMS
Source: Council on Professional Affairs

To support efforts that stimulate development of pediatric dosage forms of drug products.

This policy was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

9708
EXPRESSION OF THERAPEUTIC PURPOSE OF PRESCRIBING

This policy was superseded by ASHP policy 0305.

9711
INTERVENTIONS TO REDUCE HIGH-RISK BEHAVIORS IN INTRAVENOUS DRUG USERS

Source: House of Delegates Resolution

ASHP supports the use of needle and syringe exchange programs, drug abuse treatment, and community outreach programs for substance abusers to reduce the risk of transmission of the human immunodeficiency virus (HIV), hepatitis B virus, and hepatitis C virus in intravenous drug users.

This policy was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

1996 Policy Positions

9601
STANDARDIZATION OF MEDICATION FORMULARY SYSTEMS

This policy was superseded by ASHP policy 2016.

9606
FDA REFORM

This policy was superseded by ASHP policy 0012.

9607
CODE OF ETHICS

Source: Council on Legal and Public Affairs

To endorse the Code of Ethics for Pharmacists.

The endorsement of this document was reviewed in 2018 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

9608
USE OF COLOR TO IDENTIFY DRUG PRODUCTS

Source: Council on Professional Affairs

To support the reading of drug product labels as the most important means of identifying drug products; further,

To oppose reliance on color by health professionals and others to identify drug products; further,

To oppose actions by manufacturers of drug products and others to promulgate reliance on color to identify drug products.
This policy was reviewed in 2019 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

9609
HUMAN FACTORS CONCEPTS
Source: Council on Professional Affairs
To encourage pharmacists to apply human factors concepts (human errors related to inadequate systems or environment) in the prevention, analysis, and reporting of medication errors; further,

To encourage research (in conjunction with other groups, as appropriate) to identify human factors causes of medication errors and opportunities for their prevention.

This policy was reviewed in 2015 by the Council on Pharmacy Practice and the Board of Directors and was found to still be appropriate.

9613
THE EXPANDED ROLE OF PHARMACY TECHNICIANS

This policy was discontinued in 2002.

9614
DUES AUTHORITY

This policy was discontinued in 2001.
1995 Policy Positions

9502
ASHP CONTINUING-EDUCATION ACTIVITIES AND NONTRADITIONAL PHARM.D. PROGRAMS

This policy was discontinued in 2002.

9503
MODEL CONTINUING EDUCATION REGULATIONS

This policy was discontinued in 1998.

9504
ASHP STATEMENT ON THE PHARMACIST'S RESPONSIBILITY FOR DISTRIBUTION AND CONTROL OF DRUG PRODUCTS
Source: Council on Professional Affairs

To approve the ASHP Statement on the Pharmacist's Responsibility for Distribution and Control of Drug Products.

This statement supersedes a previous version dated June 1, 1992, and ASHP policy 9210.

This statement was reviewed in 2005 by the Council on Professional Affairs and by the Board of Directors and was found to still be appropriate.

9505
ASHP STATEMENT ON THE ROLE OF THE PHARMACIST IN PATIENT-FOCUSED CARE

This statement was discontinued in 2002.

1994 Policy Positions

9401
PATIENT-FOCUSED CARE

This policy was discontinued in 2005.

9406
PATIENT’S RIGHT TO CHOOSE

This policy was superseded by ASHP policy 0013.
9407
PRIMARILY AND PREVENTIVE CARE

This policy was discontinued in 2017.

9409
NABP MODEL PHARMACY PRACTICE ACT LANGUAGE ON THE RESPONSIBILITY OF THE PHARMACIST FOR OVERALL MEDICATION DISTRIBUTION SYSTEMS

This policy was discontinued in 2004.

9411
NAME CHANGE
Source: Board of Directors
To change the name of the American Society of Hospital Pharmacists, Inc. (ASHP) to the American Society of Health-System Pharmacists, Inc. (ASHP), effective January 1, 1995; further,

To amend the ASHP Charter, Second Article, by deleting Hospital and substituting Health-System; further,

To amend and restate the ASHP Bylaws, Article 1.1, to conform to the amended ASHP Charter; further,

To declare that this Charter amendment is advisable, and direct that the Charter amendment be submitted to the House of Delegates and the membership for consideration.

The ASHP membership approved this action by mail ballot, September 1994.

1993 Policy Positions

9303
HEALTH-CARE REFORM

This policy was discontinued in 2018.

9304
ASHP STATEMENT ON PHARMACEUTICAL CARE
Source: Council on Professional Affairs
To approve the ASHP Statement on Pharmaceutical Care.

This statement was reviewed in 1998 by the Council on Professional Affairs and by the Board of Directors and was found to still be appropriate.
9306
ASHP STATEMENT ON THE PHARMACIST’S ROLE WITH RESPECT TO DRUG DELIVERY SYSTEMS AND ADMINISTRATION DEVICES
Source: Council on Professional Affairs
To approve the ASHP Statement on the Pharmacist’s Role with Respect to Drug Delivery Systems and Administration Devices.

This statement supersedes a previous version dated June 5, 1989, and ASHP policy 8904.

9307
DRUG DISTRIBUTION SYSTEMS IN ORGANIZED HEALTH-CARE SYSTEMS

This policy was discontinued in 2002.

9309
EXPIRATION DATING OF PHARMACEUTICAL PRODUCTS

This policy was superseded by ASHP policy 1712.

9310
RECOGNITION OF ONCOLOGY PHARMACY PRACTICE AS A SPECIALTY

This policy was discontinued in 2000.
1992 Policy Positions

9201
HUMAN IMMUNODEFICIENCY VIRUS (HIV) POSITIVE EMPLOYEES

This policy was discontinued in 2008.

9202
NEEDLE-FREE DRUG PREPARATION AND ADMINISTRATION SYSTEMS

This policy was discontinued in 2007.

9204
ELECTRONIC COMMUNICATION OF MEDICAL INFORMATION

This policy was discontinued in 2002.

9205
AUTOMATED SYSTEMS

This policy was discontinued in 2012.

9206
MEDICATION-ERROR REPORTING

This policy was discontinued in 2000.

9207
AVERSIVE FLAVORING

This policy was discontinued in 1998.

9208
ASHP STATEMENT ON THE USE OF MEDICATIONS FOR UNLABELED USES
Source: Council on Professional Affairs

To approve the ASHP Statement on the Use of Medications for Unlabeled Uses.

9209
ASHP STATEMENT ON THE PHARMACY AND THERAPEUTICS COMMITTEE

This policy was superseded by the ASHP Statement on the Pharmacy and Therapeutics Committee and the Formulary System dated June 10, 2008.
9211
TAMPER-EVIDENT PACKAGING ON TOPICAL PRODUCTS
Source: House of Delegates Resolution
To support the standardization and requirement of tamper-evident packaging on all topical products, including all dermatologicals and nonprescription products.

This policy was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

1991 Policy Positions

9103
DRUG TESTING

This policy was superseded by ASHP policy 1717.

9106
MEDICAL DEVICES

This policy was superseded by ASHP policy 1820.

9108
EMPLOYEE TESTING
Source: Council on Legal and Public Affairs
To oppose the use of truth-verification testing such as polygraphs as routine employment practices because of the possible interference with the rights of individuals; further,

To recognize the limited use of such testing during employment where such testing may protect the rights of individuals against false witness.

This policy was reviewed in 2017 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.

9111
ASHP STATEMENT ON PHARMACEUTICAL RESEARCH IN ORGANIZED HEALTH-CARE SETTINGS
Source: Council on Professional Affairs
To approve the ASHP Statement on Pharmaceutical Research in Organized Health-Care Settings.
This policy supersedes the ASHP Statement on Institutional Pharmacy Research and ASHP policy 8517.

9118
STATEMENT OF PRINCIPLE FOR PHARMACISTS’ RELATIONSHIP WITH INDUSTRY

This policy was discontinued in 1999.

9121
LIMITED AUTHORITY TO ADJUST THE DUES RATE

This policy was superseded by ASHP policy 9614.

9122
RECOGNITION OF PSYCHOPHARMACY PRACTICE AS A SPECIALTY

This policy was discontinued in 2000.
1990 Policy Positions

9001
REIMBURSEMENT FOR UNLABELED USES OF FDA-APPROVED DRUG PRODUCTS

This policy was superseded by ASHP policy 0206.

9002
ASHP STATEMENT ON CONTINUING EDUCATION

This statement was discontinued in 2014.

9004
HOME INTRAVENOUS THERAPY

This policy was superseded by ASHP policy 0414.

9005
GENERIC DRUG PRODUCTS

This policy was discontinued in 2007.

9006
NONDISCRIMINATORY PHARMACEUTICAL CARE

This policy was discontinued in 2017.

9007
DRUG NAMES, LABELING, AND PACKAGING

This policy was superseded by ASHP policy 0020.

9008
STANDARDIZED PROTOCOL FOR INFORMATION EXCHANGE BETWEEN HOSPITALS

This policy was discontinued in 1998.

9009
STUDENT MEMBERSHIP DUES

This policy was discontinued in 2000.
9010

GENERIC PHARMACEUTICAL TESTING

This policy was superseded by ASHP policy 1803.

9011

DRUG NOMENCLATURE

Source: House of Delegates Resolution

To work with the FDA, USP, and pharmaceutical industry to assure that drug products are named in a manner that clearly and without confusion permits identification of ingredients’ strengths and changes.

This policy was reviewed in 2019 by the Council on Public Policy and by the Board of Directors and was found to still be appropriate.
1989 Policy Positions

8903
POLITICAL ACTION COMMITTEE (PAC)

This policy was discontinued in 1998.

8907
ASHP STATEMENT ON UNIT DOSE DRUG DISTRIBUTION
Source: Council on Professional Affairs
To approve the ASHP Statement on Unit Dose Drug Distribution.

This statement supersedes a previous version dated June 8, 1981.
1988 Policy Positions

8802
EDUCATIONAL PROGRAM RESOURCES FOR AFFILIATED STATE CHAPTERS

This policy was superseded by ASHP policy 0215.

8804
EMPLOYEE DRUG TESTING

This policy was discontinued in 1998.

8808
HUMAN IMMUNODEFICIENCY VIRUS INFECTIONS

This policy was discontinued in 2007.

8809
COUNCIL ON THERAPEUTICS

This policy was discontinued in 2002.

8810
PROMOTION OF PHARMACISTS’ PROFESSIONAL IMAGE

This policy was discontinued in 2001.

8812
RECOGNITION OF NUTRITIONAL SUPPORT PHARMACY PRACTICE AS A SPECIALTY

This policy was discontinued in 2000.
8701
PHARMACISTS’ ROLE IN DRUG PROCUREMENT PROCESS

This policy was superseded by ASHP policy 9908.

8704
NATIONAL MANPOWER DATA SYSTEM

This policy was discontinued in 2002.

8705
ASSESSMENT SURVEY OF CONTINUING EDUCATION NEEDS

This policy was discontinued in 2002.

8706
STAFF DEVELOPMENT PROGRAMS AND RESOURCES

This policy was superseded by ASHP policy 0112.

8707
VACCINE AVAILABILITY

This policy was discontinued in 2000.

8708
THERAPEUTIC INTERCHANGE
Source: Council on Legal and Public Affairs
To support the concept of therapeutic interchange of various drug products by pharmacists under arrangements where pharmacists and authorized prescribers interrelate on the behalf of patient care.

This policy was reviewed in 2019 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

8709
CODES ON SOLID DOSAGE FORMS OF PRESCRIPTION DRUG PRODUCTS

This policy was discontinued in 2017.
8711
CLINICAL INVESTIGATION OF DRUGS USED IN ELDERLY AND PEDIATRIC PATIENTS

This policy was superseded by ASHP policy 0229.

8712
THE PHARMACEUTICAL INDUSTRY AND DESIGN OF INVESTIGATIONAL STUDIES IN INSTITUTIONS

This policy was discontinued in 2000.
1986 Policy Positions

8607
PHARMACY CRIME

This policy was discontinued in 2002.

8610
PHARMACY TECHNICIANS

This policy was discontinued in 2012.

8612
INTERNATIONAL SYSTEM OF UNITS

This policy was discontinued in 2014.

8613
ELIMINATION OF APOTHECARY SYSTEM
Source: Council on Professional Affairs

To recommend to all health professions and to the Pharmaceutical Manufacturers Association (PMA) (now the Pharmaceutical Research and Manufacturers of America, abbreviated "PhRMA") that the apothecary system be eliminated in referring to dosage quantities and strengths.

This policy was reviewed in 2017 by the Council on Pharmacy Practice and by the Board of Directors and was found to still be appropriate.

8614
MEDICATION ERRORS AND RISK MANAGEMENT

This policy was superseded by ASHP policy 0021.

8619
NONTRADITIONAL PHARMACY PRACTICE SETTINGS

This policy was discontinued in 2000.
8504
STATEMENT ON THIRD-PARTY COMPENSATION FOR CLINICAL SERVICES BY PHARMACISTS

This statement was discontinued in 2005.

8506
INTERNSHIP, EXTERNSHIP, AND CLERKSHIP

This policy was discontinued in 2002.

8507
CAREER COUNSELING
Source: Council on Educational Affairs

To urge colleges of pharmacy to develop career counseling programs to make students aware of postgraduate career options, including residency training and career paths in various types of practice; further,

To urge that career counseling occur in a structured manner early in the curriculum and be continued throughout the curriculum; further,

To urge practitioners in various organized health-care settings to make themselves available to colleges of pharmacy for participation in both structured and unstructured career counseling.

This policy was reviewed in 2017 by the Council on Education and Workforce Development and by the Board of Directors and was found to still be appropriate.

8508
EXTERNAL DEGREE PROGRAMS AND INITIATIVES FOR HELPING PRACTITIONERS UPGRADE SKILLS

This policy was discontinued in 2007.

8510
ORGAN TRANSPLANT LEGISLATION

This policy was discontinued in 2002.

8511
PHARMACIST DISPENSING OF CERTAIN DRUGS
8512
FDA REVIEW OF DRUG PRODUCTS FOR SAFETY AND EFFICACY

This policy was discontinued in 2002.

8514
NATIONAL DRUG CODE

This policy was discontinued in 2002.

8515
CONTROLLED SUBSTANCES REGULATIONS

This policy was superseded by ASHP policy 9813.

8516
SINGLE UNIT PACKAGES

This policy was discontinued in 2000.

8517
STATEMENT ON INSTITUTIONAL PHARMACY RESEARCH

This statement was superseded by the ASHP Statement on Pharmaceutical Research in Organized Health-Care Settings and ASHP policy 9111.

8519
HOSPITAL PHARMACY MANAGEMENT INFORMATION SYSTEM (HPMIS)

This policy was discontinued in 1999.

8520
BULK RESALE OF DRUG PRODUCTS

This policy was discontinued in 2000.
8402
HEALTH-CARE FINANCING: DEPARTMENTAL STRATEGIES

This policy was discontinued in 1999.

8406
PATIENT EDUCATION

This policy was discontinued in 1998.

8407
ASHP PRACTICE STANDARDS AS AN INTEGRAL PART OF EDUCATIONAL PROCESS

This policy was superseded by ASHP policy 0705.

8408
DRUG PRICE COMPETITION ACT—POST-1962 ABBREVIATED NEW DRUG APPLICATION LEGISLATION

This policy was discontinued in 2002.

8409
VETERANS ADMINISTRATION PERSONNEL LEGISLATION

This policy was discontinued in 1998.

8410
USE OF DRUGS IN CAPITAL PUNISHMENT

This policy was superseded by ASHP policy 1531.

8411
DISSOLUTION OF COUNCIL ON EDUCATIONAL AFFAIRS

This policy was discontinued in 2001.

8412
AFFILIATED STATE CHAPTER MEMBERSHIP AND ASHP APPOINTMENTS

This policy was superseded by ASHP policy 0118.
1983 Policy Positions

8302
MEDICAID COST-CONTAINMENT OPTIONS

This policy was discontinued in 1998.

8303
MATERIALS MANAGEMENT

This policy was discontinued in 2000.

8305
OUTPLACEMENT OF PHARMACY DIRECTORS

This policy was discontinued in 1999.

8310
SIZE, COLOR, AND SHAPE OF DRUG PRODUCTS

This policy was discontinued in 2018.

8311
ASHP PLANNING PROCESS AND ASHP LONG-TERM GOALS

This policy was discontinued in 2003.

8312
DEA RECORDKEEPING REQUIREMENTS

This policy was discontinued in 2000.
1982 Policy Positions

8201
PLAN OF ACTION FOR DEALING WITH PHARMACY REIMBURSEMENT MATTERS

   This policy was discontinued in 2002.

8205
STUDIES ON COSTS AND BENEFITS OF CLINICAL PHARMACY SERVICES

   This policy was discontinued in 2006.

8207
MEDIATED CONTINUING EDUCATION PROGRAMMING

   This policy was discontinued in 2000.

8210
CONTINGENCY PLAN TO ASSIST STATE CHAPTERS' ADJUSTMENTS TO FEDERAL BUDGET REFORMS

   This policy was discontinued in 1998.

8211
PATENT TERM RESTORATION

   This policy was discontinued in 1998.

8212
HOME HEALTH CARE

   This policy was discontinued in 2004.

8213
PHARMACY CRIME

   This policy was discontinued in 1998.

8214
APPORTIONMENT/DELEGATE REPRESENTATION

   This policy was discontinued in 2002.
8216
ANNUAL MEETING REGISTRATION FEES FOR DELEGATES

This policy was discontinued in 2007.

8219
AMERICAN HOSPITAL FORMULARY SERVICE

This policy was discontinued in 2002.
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