



Pharmacy Quality Assurance Committee  
Pharmacy Business Practices Committee  
*Chair's Report to Commission – January 29, 2015*

The Committee met three times since the Commission's December 11, 2014 business meeting: immediately after the December 11 meeting; on January 6, 2015; and on January 15, 2015. There also will be another meeting today (January 29) following the business meeting.

A major part of all these meetings was devoted to presentation and discussion of preliminary results from the 2014 Pharmacy Survey. On December 11 the committee heard a preliminary report on responses to the open comments field of the survey (Question 23), which was released on December 8 and is available on the "Rules in Progress" section of the PQAC website. The comment field was filled out by 1,078 respondents out of over 3,200 who complete any part of the survey (and the 2,638 who responded to substantially all questions). The overwhelming majority of comments are from line pharmacy staff (pharmacists, technicians, PIC/managers and externs/interns) in community pharmacy practice. The report briefly lists the most common areas of comment, then presents the full text of all comments (120 pages), grouped by respondents' roles and edited to remove potential identifying information. A great deal of dissatisfaction with job stress is expressed, Committee members and several other commenters expressed little surprise at the themes expressed, but a degree of shock regarding some of the details recounted. Some public comments at the meeting noted that payment pressure is enormous throughout the health care industry; that some negative comments might result from poor fit between individual staff and their specific job duties; and requested the committee to be evidence-based and focus on patient safety. There were suggestions on further analysis (by respondent profession, role, site, etc.) and some beginning discussion of quality improvement approaches in use.

The January 6 committee meeting similar focused on presentation and discussion of the structured questions in the survey. The preliminary report on these questions was released on January 5 in the form of a Power Point presentation; a slightly revised version of the slides (reflecting discussion at the January 6 meeting) was redistributed and is posted on the "Rules in Progress" webpage. The January 6 meeting also included brief presentation and committee discussion of a high level "Road Map" showing stages in the committee's work. The Road Map is attached to this Chair's report for easy reference; it also is on the "Rules in Progress" page.

Discussion of both structured and "comment" questions from the survey continued at the January 15 meeting, which incorporated five sites. A slide pack developed for the January 15 meeting recapitulated high-level findings from both aspects of the survey and it is the best overall summary available at this time. In general, very substantial numbers and proportions of respondents express concern with time available to do pharmacy jobs, feel rushed, report inadequate time for breaks and lunches, and are concerned that interruptions and distractions make accurate work difficult. As on December 11, some public participants commented there is high pressure throughout the health care industry, not only in



pharmacy settings. Another series of questions explored quality improvement processes and response to errors. Responses show high agreement that there are efforts to identify the causes of errors, but with much higher attention when errors that “could cause harm” reach patients than when errors “could not cause harm,” or when the errors do not reach patients (even if they could have caused harm if they had). Discussion noted that (1) some minor errors may not be worth the time to deeply document; (2) discovery of errors is lower without universal counseling, (3) concepts such as “error” need consistent definition; and (4) there is much to learn from the range of QI practices and standards in the pharmacy and broader health care environment.

On January 15 the committee formalized moving forward to additional "stages" (on the Road Map) in three areas:

- Workload, pacing, interruptions, and staffing (the highest priority);
- Prescription transfers (a more focused topic, possibly simpler); and
- QI practices.

Specifically the work now proceeds to:

- The part of problem definition that focuses on demonstrated impact on patients/public (distinct from the experiences, perceptions and fears of staff);
- Common understanding of our current legal environment in these topical areas (statute and rules); and
- Preliminary review of remedies and standards used in various settings/jurisdictions, as a first step in scanning for possible actions.

Efforts to accommodate multiple sites through technology continue to pose challenges. The committee is inclined to build on in-person meeting opportunities the days of Commission Business meetings; focus multi-site teleconferences on discussion (without attempting to also manage complex visual presentations); and use Webinar methods for other meetings that do involve visual presentations.



**Pharmacy Business Practices Committee – Road Map (Draft #2 –1/7/15)**

	<b>Major Stages (May Overlap/Iterate)</b>		<b>Issues (Examples)</b>		<b>Information Sources (Examples)</b>
	A. Problem Identification <ul style="list-style-type: none"> <li>• Issues</li> <li>• Magnitude of Impact/Risk</li> </ul>		<ul style="list-style-type: none"> <li>• Prioritized highest: Workload/ staffing; Rx transfers/solicitations; environment for clinical functions</li> <li>• Also prioritized: business account-ability/contributory responsibility; quality improvement expectations</li> <li>• Others: per 8/7/14 meeting or added within scope</li> </ul>		<ul style="list-style-type: none"> <li>• 2014 comments on scope</li> <li>• WA Pharmacy Survey (2014): structured questions, comments</li> <li>• Compliance: inspections, investigations</li> <li>• Published research/analysis</li> <li>• Public comments</li> <li>• Data acquired from QI or other business processes</li> <li>• Other: Welcome help identifying</li> </ul>
	B. Review of Current Rules <ul style="list-style-type: none"> <li>• Add to problems: any rule and process deficiencies that impair enforcement of enunciated standards/expectations</li> </ul>		<ul style="list-style-type: none"> <li>• Shared understanding of both safeguards and possible deficiencies in current PQAC rules</li> <li>• What other agency rules (e.g., L&amp;I) have bearing on topics?</li> </ul>		<ul style="list-style-type: none"> <li>• Focused review of rules</li> <li>• Presentations: state lawyers</li> <li>• Committee Q &amp; A</li> <li>• Public comments</li> <li>• Clarifications</li> </ul>
	C. Possible Remedies <ul style="list-style-type: none"> <li>• Prescriptive</li> <li>• Quality Improvement</li> <li>• Hybrids and Other</li> </ul>		<ul style="list-style-type: none"> <li>• What types of remedies are in WA rules? Other jurisdictions’ rules?</li> <li>• What other options exist? (e.g., “problem-triggered standards”)</li> </ul>		<ul style="list-style-type: none"> <li>• Other jurisdictions’ rules</li> <li>• Policy literature/ideas related to regulation, safety, quality</li> <li>• Discussion</li> </ul>
	D. Drill Down <ul style="list-style-type: none"> <li>• Pros and Cons</li> <li>• Critiques and Adjustments</li> </ul>		<ul style="list-style-type: none"> <li>• What possible remedies will be prioritized based on assessment of relative impact and feasibility?</li> </ul>		<ul style="list-style-type: none"> <li>• Committee deliberation (using available resources)</li> <li>• Public comments</li> </ul>
	E. Trial Balloons (“Chunked Out”) <ul style="list-style-type: none"> <li>• Committee-approved concepts</li> <li>• Not rule proposals</li> <li>• Public comment</li> </ul>		<ul style="list-style-type: none"> <li>• How to recognize problems and potential remedies that are ripe for committee to put out for reactions?</li> <li>• Reassuring public this is exploratory</li> </ul>		<ul style="list-style-type: none"> <li>• Committee consideration and analysis (iterative)</li> <li>• Public comment</li> <li>• Refinement of concepts</li> </ul>
	F. Integration and Iterative Drafting				
	G. Formal Rule Processes <ul style="list-style-type: none"> <li>• CR-102, SBEIS, CR-103, etc.</li> </ul>		<ul style="list-style-type: none"> <li>• How to stage rules (may be more than one formal proposal)</li> </ul>		



***Throughout: Public comment/adjustment***