



American Hospital  
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October 14, 2015

Michael R. Cohen, RPh, MS, ScD  
President  
Institute for Safe Medication Practices  
200 Lakeside Drive  
Suite 200  
Horsham, PA 19044

*Submitted Electronically*

***Re: Request for Comment: Guidelines for Safe Electronic Communication of Medication Information***

Dear Dr. Cohen:

On behalf of our nearly 5,000 member hospitals, health systems and other health care organizations, and our 43,000 individual members, the American Hospital Association (AHA) appreciates the opportunity to comment on the draft guidelines for safe electronic communication of medication information, released by the Institute for Safe Medication Practices (ISMP) on Aug. 27.

America's hospitals are committed to ensuring the highest level of patient safety and utilize health information technology (IT) as one of many tools to continuously ensure and improve the safety of health care. An efficient and effective infrastructure for health information capture and exchange in support of the delivery of high-quality, patient-centered care across health care settings requires safe and reliable electronic health records (EHRs). Accordingly, the consistent implementation of mature standards is central to the safe use of EHRs.

In an area where standards or implementation guides lack the specificity to support safe and reliable care, additional evidenced-based and scientifically recognized guidance is necessary. **Given the increased reliance on EHRs in the delivery of health care, and the critical importance of medication safety, the AHA supports the adoption of guidelines for safe electronic communication of medication information, as developed by ISMP. We also support the ISMP's goal to share the final guidelines with the Office of the National Coordinator for Health Information Technology (ONC) to advance the recognition of the guidelines in the standards and implementation specifications used in EHRs.**



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The inclusion of industry-recognized guidelines for terminology used in electronic communication is important to providing reliability of information presented in EHRs. Standards of practice followed by pharmacies have existed for years. EHRs should support existing standards and guidelines in order to provide consistent pharmacy practices, including the delivery and administration of medications. Multiple standards have been included as requirements in the meaningful use program, some of which are immature or designed to offer flexibility in their interpretation and implementation. The AHA applauds the ISMP for addressing the challenge presented when there is an absence of an agreed upon structure or form for presenting electronic information. As the proposed guidelines suggest, the inconsistent representation of electronic medication information can result in misinterpretations that can introduce errors in the delivery of care. A word such as “units” that is abbreviated with the letter “U” and mistaken for an intention to abbreviate IU (international unit), IV (intravenous) or the number zero can introduce uncertainty for the clinician seeking to provide care in time-sensitive circumstances.

The AHA also appreciates the inclusion of guidance that addresses the design features in EHRs that impact the presentation of medication information. The size of fonts, the spacing between data fields and the minimum components of a complete medication order or prescription influence the ability of clinicians to use health IT products to safely provide care.

In the electronic environment, medication information moves among several technologies that connect to or are part of EHRs, such as electronic medication reconciliation (eMAR) systems, software that uses data to provide clinical decision support and devices that deliver medication, like an infusion pump. Providers need confidence that the data presented are trustworthy as they move between information systems.

Hospitals and physicians bear ultimate responsibility for the safe delivery of care to the patient and must have the assurance that today’s standards, implementation specifications and guidelines result in EHRs that are safe and reliable. The AHA supports the ISMP guidelines and your contribution to the advancement of the culture of safety and quality in health care.

If you have any questions, please contact me or Diane Jones, senior associate director of policy, at (202) 626-2305 or [djones@aha.org](mailto:djones@aha.org).

Sincerely,

/s/

Ashley Thompson  
Vice President and Acting Senior Executive of Policy