



Hospital Corporation of America

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Larry L. Pinson  
Executive Secretary  
Nevada Board of Pharmacy  
431 W. Plumb Lane  
Reno, Nevada 89509

January 5, 2010

Dear Larry,

The Hospital Corporation of America (HCA) owns and operates three hospitals in Las Vegas, Sunrise Medical Center, MountainView Hospital, and Southern Hills. Core to the HCA business model for pharmacy management is Centralized Order Entry (COE). Currently, HCA operates five COE pharmacies that service nearly 70 hospitals in 23 States.

HCA has developed a sophisticated and successful model for offsite remote physician order entry that has been in use since 2005. The COE pharmacy model has allowed HCA institutional pharmacists to spend more time providing clinical services to hospitalized patients by freeing them up from the routine activity of physician order entry.

We are aware that current Nevada Law does not allow COE activity 24/7, but that The Board is embarking on a process to revise pharmacy regulations. We would like the opportunity to meet with your board, describe our COE program, and investigate the possibility of receiving approval to provide COE services for the three HCA facilities in Nevada. We have been in communication with Don Fey, an HCA pharmacist and President of your Board of Pharmacy as to how best to work with you in this effort.

We are requesting to be on the agenda for your March 2010 meeting. I am including some additional materials that will help further describe the HCA COE program.

Thank you for your consideration,

R. Kelly Hansen RPh, MPA  
HCA Division Director of Pharmacy  
801-444-8856

JAN 13 2010

## HOSPITAL CORPORATION OF AMERICA PHARMACY CENTRALIZED ORDER ENTRY PROGRAM

### Mission Statement

Centralized Order Entry is a pharmacist order entry service providing 24/7 comprehensive and timely prospective medication order reviews, improved order entry efficiency, and supports the integration of the hospital pharmacist into clinical care activities that promote safe and cost-effective patient-focused care.

### Goals:

Increase Patient Safety

- Clinical intervention pharmacists can reduce adverse events.
- Clinical Intervention pharmacists education to patients can reduce medication errors

Reduce Drug Costs

- Pharmacist's redeployment for clinical interventions will reduce drug spend.

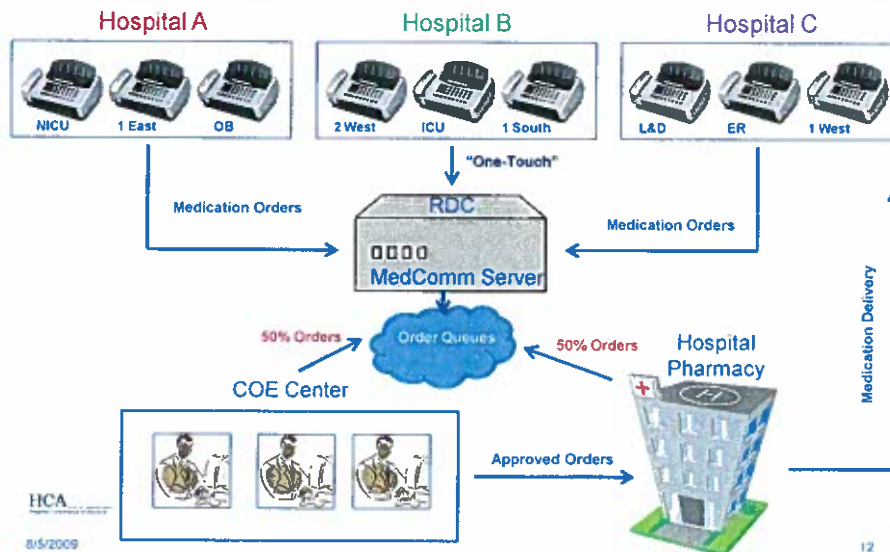
### Critical Success Factors

#### **Program Standardization**

- ✓ Hardware/Software Platform
- ✓ Policies & Procedures (Best Practices)
- ✓ Service Level Agreements
- ✓ IT&S Support Model

#### **Plan to Realize the "Full Benefits" of the Program**

- ✓ 24/7 Pharmacy Coverage for Hospitals
- ✓ Cost Avoidance
- ✓ Improved Productivity
- ✓ Flexible Working Hours for Pharmacists
- ✓ Increased Direct Patient Interaction & Clinical Intervention Activity



### **Hospital Corporation of America Central Order Entry Program Highlights**

- Program started in 2005.
- Four Central Order Entry Pharmacies strategically located across the Country.
- Regional Data Centers strategically placed across the country. Security of data and redundant back up to highest of industry standards.
- Currently servicing more than 70 hospitals in 23 States.
- Processing over 400,000 activities a month.
- Documented increased clinical activity from pharmacists freed up from order entry functions.
- Service Level Agreement between COE Pharmacy and Client Hospital clearly defining services to be provided.
- Continuous Quality Improvement Process
  - Monthly Dashboard reports.
- State of the art information technology solutions deployed across the HCA system of hospitals.
- Advisory Board consisting of process management engineers, pharmacy directors, information technology experts.

### **Denver Colorado Central Order Entry Pharmacy**

- Licensed pharmacy beginning in September of 2008
- 18 licensed pharmacists entering orders for 12 HCA hospitals in 6 States.
- Pharmacy and pharmacists are registered/licensed in the all States they serve allowing for State Board of Pharmacy oversight.
- Pharmacists training and mentoring program at Central Order Entry Pharmacy.
  - Documented competency testing.
- Complete Policy and Procedure manual.
  - Down time procedure
  - Order clarification process
  - Establishment of common dictionaries
  - Medi-Tech screen alerts for auto substitutions
  - Defined scope of order type to be processed at Central Order Entry Pharmacy
  - IT Support functions clearly defined.
  - Standardized IT platforms.

## **COE Operational Policies and Procedures**

1. Mission Statement
2. Communication
3. DEA Restrictions and Prescribing Privilege Validation
4. COE Downtime Procedures
5. Volume Escalation Plan
6. Pharmacist and Pharmacy Licenses
7. Pharmacy Policy & Procedure Manual
8. Pharmacy Record Maintenance
9. Pharmacy References
10. Pharmacy Information System Access
13. COE Pharmacy Safety Plan
14. COE Participating Hospitals and Pharmacies
15. Security Pharmacy
16. Pharmacy and Therapeutic Committee
17. COE Intervention Documentation
18. Meditech and COE System Access
19. COE Advisory Board

## **COE Medication Management**

1. Scope of Care
2. Unapproved Abbreviations
3. Illegible Order
4. Patient Allergy Status Missing
5. Formulary System for Medication
6. Medication Order Review
7. Medication Profile
8. Patient Information Missing
9. Herbal medications and Alternative Therapies
10. Therapeutic Interchanges/Substitutions
11. Non-Formulary Not in Database
12. Clinical Intervention Documentation
13. Pharmacokinetic Dosing
14. Physician Medication Order Entry
15. Patient Own Medication
16. Hold Order Management
17. Weight Based Order
18. Renal Dosing
19. Patient Own Med
20. IV to PO
21. Possible Allergy to New Order
22. Automatic Stop Orders

## **COE HR Policies**

1. Confidentiality
2. Pharmacy Orientation, Competency and Continuing Education
3. Home-Based Order Entry Shared Services P&P
4. Performance Improvement
5. Performance Metrics
6. Adverse Event Reporting
7. Medication Incident Reporting

## **Additional P&P's**

1. Hurricane Plans/Disaster Plans
2. Regulatory Compliance Notification from Quality Management