

# ACCP WHITE PAPER

## Establishing and Evaluating Clinical Pharmacy Services in Primary Care

American College of Clinical Pharmacy  
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Health care reform has renewed the interest in primary care. Major problems with America's health care system include escalating health care costs, maldistribution of health care providers into urban areas, lack of health care insurance, and the excessive utilization of specialists. These issues have assured that health care reform will take place. At the time of this report, the nature and format of a reform plan has not been determined. Nevertheless, many agencies are rapidly evaluating their current health care coverage and are preparing for the inevitable reform that will take place.

There have been disproportionately high numbers of medical specialists compared with generalists since the 1960s.<sup>1</sup> Worldwide, there are approximately five to six generalists for every subspecialist. For various reasons, perhaps most importantly, economics, this ratio is reversed in the American health care system. For well over 20 years, governmental agencies and medical academicians have tried to increase the numbers of primary care providers without significant success. With millions of underinsured Americans, the provision of primary care has become a national priority. Clinical pharmacists must become more involved in the provision of primary patient care. Most clinical pharmacists, however, have not viewed themselves as primary care providers and,

therefore, may not feel adequately prepared to become a member of an interdisciplinary primary care team.

This report is an extension of a previous ACCP White Paper on Clinical Pharmacy Practice in the Noninstitutional Setting.<sup>2</sup> That White Paper described the functions that should be expected of clinical pharmacists in ambulatory care settings. The purpose of the present report is to assist practitioners and administrators who wish to establish and evaluate services in ambulatory care and primary care settings. This paper presents approaches to define the scope of a pharmacist's practice and obtain clinical privileges, evaluate the process of delivering care, evaluate patient outcomes related to pharmacotherapeutic decisions, and define the legal implications of providing primary patient care.

### Definitions

There is considerable confusion in pharmacy concerning current definitions of practice sites and practice philosophies. *Ambulatory care* includes all health-related services in which patients walk to seek their care.<sup>1</sup> These services may be provided in emergency rooms, urgent centers, private offices, primary care clinics, specialty and subspecialty clinics, and community pharmacies.

*Primary care* is a subset of ambulatory care with unique features and philosophies.<sup>1</sup> (By definition, inpatient care is never a primary level of care.) One set of definitions<sup>3</sup> suggests that primary care is a form of care that includes:

1. "first-contact" care, serving as a point-of-entry for the patient into the health care system;
2. continuity by virtue of caring for patients over a period of time, both in sickness and in health;
3. comprehensive care, drawing from all the

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traditional major disciplines (medical specialties, nutrition, and social) for its functional content;

4. the assumption of continuing responsibility for individual patient follow-up and community health problems; and
5. highly personalized care.

Dr. Elizabeth Short of the Veterans Administration (VA) Central Office has stated, "Primary care is the coordinated, interdisciplinary provision of health care that consists of health promotion, disease prevention, comprehensive management of acute and chronic medical and mental health conditions, and patient education. A primary care physician coordinates access to and integration of other components of health care, such as inpatient, long-term, or subspecialty care, and psychosocial support. Under primary care, a provider or provider team is the primary source of a patient's care, and the place that a patient turns to for health care information and support."<sup>4</sup>

The key feature of primary care clinicians is that they handle a wide range of medical conditions. They serve as the entry point into the health care system and decide on referral or triage to secondary or tertiary levels of care. Specialty clinics provide ambulatory care, and, in many cases, some primary care. Most specialists (e.g., cardiology, neurology, nephrology, etc.), however, are considered secondary levels of care. These secondary and tertiary levels of care should be utilized when a problem is beyond the expertise of the primary care clinician. The typical family practice physician or general internist cares for well over 90% of problems that present to them. There is a small percentage of problems that would require referral to secondary or tertiary care. Even when a patient is referred for a specific problem, the primary care clinician should maintain overall care for the patient and coordinate all other aspects of care. This continuity implies chronic care and preventive care that are more conducive to long-term assessments of patient outcomes than can be achieved with acute illness managed in the inpatient setting.<sup>3</sup>

Clinical pharmacists and pharmacotherapy specialists provide care in a wide variety of ambulatory care and primary care settings.<sup>1,2</sup> There are two major types of practice that are very distinct. While currently more common in structured settings such as hospitals and health maintenance organizations, primary care is increasingly being provided in many settings including community pharmacies. The first type of practice is one in which the pharmacist is

*independently responsible for providing primary care*, typically between regularly scheduled physician visits. This includes conducting complete histories; obtaining objective information including physical assessment and ordering laboratory tests; starting, stopping, or changing drug therapy; and determining the appropriate timing of follow-up visits. These activities are common in pharmacist-managed clinics in the Indian Health Service, medical centers, and VA hospitals, including hypertension, diabetes, hyperlipidemia, anticoagulation, and pharmacy service clinics. These activities are in contrast to those provided by other professionals such as physician assistants or nurse practitioners who may perform functions traditionally performed by a physician.

The second type of setting is an *interdisciplinary team approach* to care of the patient where the pharmacist sees patients with physicians. Pharmacists who work in such teams assist with care at the same time other health professionals see the patient. In this setting, they may have independent patient care activities but these would not be as extensive as are generally seen in pharmacist-managed clinics. These settings would include family practice offices, general medicine clinics, or pediatric clinics.

### **Establishing an Ambulatory Care or Primary Care Practice**

#### **Obtaining Clinical Privileges**

Prior to any patient intervention, it is essential that the clinical pharmacist has in place a document that outlines specifically the practitioner's scope of practice.<sup>5</sup> It is important that the scope of this document be sufficient to allow the clinical pharmacist to function as a member of an interdisciplinary primary care team. This document could be in the form of clinical privileges or a scope of practice statement (Appendix 1). This approach could be used for developing a practice for a new practitioner or used for a previous clinician who has not formally obtained scope of practice privileges. If the facility is an organized health care center (hospital or managed-care organization), it would be worthwhile to review the facility's guidelines for clinical privileges granted to the physician's assistants and/or nurse practitioners if these are available. Depending on the institution, approval is required by the Chief of Pharmacy, Chief of Staff, Clinical Executive Board, and the Institutional Director. Once these privileges are established, only then can the clinical pharmacist provide

primary patient care (e.g., in pharmacist-managed clinics).

In the past, formal guidelines to obtain clinical privileges were often not commonly developed in private practice or other settings such as outpatient family practice settings. However, clinical pharmacists in private practice, community pharmacies, family practice residencies, and health maintenance organizations should develop these guidelines for their clinical pharmacy practitioners to ensure quality and evaluate performance. For clinicians in these settings, it is less likely that formalized arrangements for scope of practice privileges exist with physicians or other health professionals. However, similar templates as those for institutions (Appendix 1) could be used and modified for these settings.

The application form in Appendix 1 also requests data on whether the clinical pharmacist is board certified in pharmacotherapy or another specialty. Board certification should be considered strongly desirable, if not required. At the present time, the most appropriate specialty certification process for ambulatory or primary care pharmacists would be certification in pharmacotherapy. This would be analogous to physician certification in the broad-based specialty of family practice. Board certification in pharmacy will be increasingly important and it should be achieved by all ambulatory care/primary care pharmacy practitioners who provide the services outlined in this report.

### **Quality of Care Provided by Pharmacists in Primary Care: Evaluating Process and Outcomes of Patient Care**

A comprehensive discussion of quality of care assessments is beyond the scope of this paper. This area of assessment, however, will become increasingly important in the near future. This report is intended to provide the pharmacist who practices in ambulatory care with an understanding of basic principles used to assess quality. For more in-depth reviews in this area, the reader is referred to the references and the Appendixes.

There is a great deal of interest in measuring or assessing patient outcomes. As Donabedian points out, however, outcomes can only be assessed within the overall context of health care.<sup>6</sup> For instance, the therapy that a pharmacist selects may have minimal influence, or perhaps even a detrimental influence on patient care, depending on the care of other practitioners, demographic factors, and the interpersonal relationship.

Donabedian maintains that quality can only be assessed by examining the three components: structure, process, and outcome.<sup>6</sup> He suggests that there must be a knowledge of how structure and process are linked, and how outcome and process are linked before quality assessments can be made. Structure not only refers to the facility, its services and its location, but also the number and characteristics of the providers. For providers this would mean whether they are in solo or group practice and whether they are board certified.<sup>6,7</sup> For physicians it has been shown that board certification is a predictor of good process, but only by implication, of good outcomes. Process refers to what is done for the patient in providing care.<sup>6,7</sup> This includes making diagnostic and treatment decisions. Outcome refers to what happens to the patient and this may include the patients' knowledge or satisfaction with care.

Lohr and Brook have stated that quality of care is composed of both technical care and the art of care.<sup>7</sup> The art of care includes the practitioner's ability to provide reassurance, obvious concern of the patient's well-being, good counseling, and sensitivity to the patient. As examples, they cite whether the provider introduces himself to the patient, refers to the patient specifically by name, announces and/or explains activities before or while doing them (such as physical examination), and says goodbye to the patient. Obviously, these are all critical factors to address if patient satisfaction is being assessed. Providing these personal services is not new but it is increasingly important when patient satisfaction drives third-party contracts in managed care. Pharmacists must provide these personal levels of care if they truly are delivering pharmaceutical care.

### **Evaluating the Process of Delivering Care**

Performing quality assurance evaluations of specific pharmacists' performance does not measure patient outcomes, but rather, the process of delivering care. However, providing an acceptable or ideal process (or standard of care) should, by implication, create an environment conducive to better patient outcomes. However, to move from evaluating process to evaluating outcome, other specific tools must be used (see below). Appendix 2 is an example of a quality assurance form that might be used in a pharmacist-managed primary care clinic.

Guidelines are being developed for a wide range of disease states and conditions. These essentially describe processes for delivering care. They can be

used by the individual clinician to prospectively guide appropriate therapy. In contrast, they can be used retrospectively as a quality assurance measure. Appendix 3 lists 12 disease states that are critical to outpatient primary care, and that are currently the most common conditions cared for by pharmacists in primary care settings. While these are not all-inclusive, they provide examples that can be followed in other therapeutic areas. Where possible, nationally accepted clinical practice guidelines are provided for each of these disease states. It is imperative that clinical pharmacy practitioners be aware of nationally accepted guidelines for specific conditions they may treat in their settings. The importance of this is discussed below.

The Agency for Health Care Policy and Research (AHCPR) was created by Congress to be the successor of the National Center for Health Services Research. This agency explores medical conditions that affect large populations, have multiple therapeutic interventions, and have a large economic impact. Through the Medical Treatment Effectiveness Program (MEDTEP), the AHCPR examines variations in health care practices on patient outcomes.<sup>8</sup> The MEDTEP involves patient outcomes research, clinical guideline development, scientific data development, and research dissemination. The agency has supported the development of numerous guidelines such as the guidelines for depression and for angina.<sup>9</sup> The AHCPR is currently developing practice guidelines for the effective therapeutic management of asthma, arthritis, hypertension, and congestive heart failure. In addition to this federal agency, private groups such as the American College of Physicians, the American Medical Association, the BlueCross BlueShield Association, and other specialty societies are developing new treatment guidelines.

It is important to note that AHCPR is not a regulatory agency and is not involved with reimbursement. Application of the guidelines is not enforced by the government. Using these guidelines that were prepared by multidisciplinary panels of experts may allow primary care providers to deliver scientifically sound care to the patient.

There are also medical-legal issues pertaining to clinical practice guidelines developed by specialty societies. The general counsels who are involved with these issues, private practice attorneys, and the counsel of the American Medical Association generally believe that following established clinical practice guidelines would be a strong defense in malpractice cases. However, if a practitioner

deviated widely from these guidelines, he or she would need to have a strong rationale, documented in the patient's record, to support the use of an alternate regimen.

A major issue that needs to be addressed is what standards or methodologies should be followed when guidelines are developed.<sup>10</sup> A structured, systematic, science-based approach should be used whenever developing these guidelines. The Institute of Medicine has identified the necessary characteristics which would enhance a guideline's effectiveness: sensitivity, specificity, patient responsiveness, readability, minimal intrusiveness, feasibility, and computer compatibility.<sup>11, 12</sup> If guideline development followed these scientific methods, it would be difficult to criticize the process.

In contrast to good guideline development, the determination of whether guidelines are useful depends upon their readability, computer compatibility, and other factors. Outcomes management takes the results of the outcomes research and incorporates them into clinical practice guidelines to theoretically help ensure all patients receive the most effective treatment available.<sup>11, 12</sup>

#### Assessing Health Outcomes

Another objective of this report is to determine the best method to measure the impact of pharmacotherapeutic decisions made by clinical pharmacists on patient outcomes. There are several approaches that can be used to assess outcomes. These include disease- or treatment-related outcomes (e.g., blood pressure, seizure frequency, medication adherence, target serum concentrations). The Task Force felt that it was not appropriate for this report to delineate specific clinical outcomes such as level of blood pressure control or serum drug concentrations. While these are important outcome measures, the Task Force wanted to highlight optimum methods for documenting positive outcomes of clinical pharmacy interventions. To keep in step with health care reform, a good method of assessing the impact of therapy on a specific chronic disease is health-related quality-of-life (HRQL) outcome measures. The pharmaceutical industry, the medical profession, and governmental agencies have shown increasing interest in assessing new measures of a drug's overall effectiveness. Quality of life (QOL) will be considered as seriously as safety and efficacy when evaluating response to therapy.

Even when primary care providers follow accepted clinical practice guidelines, there is no assurance of a favorable outcome. That is why it is important for the clinical pharmacist to understand and use appropriate, clinically relevant outcome measures to quantify the impact of their interventions.<sup>12</sup> Bungay and Wagner argue that HRQL outcome measures should assess physical, social, and role functioning; emotional distress and well-being; general health perceptions; and energy and fatigue.<sup>13</sup> They also stress that the assessment of health status must be integrated into the care of patients. HRQL measures can be used to assess a population with a specific disease, or as a research method to examine how changes in process affect outcomes.<sup>14</sup> The current challenge is to develop tools and operations that can be used in the office setting to evaluate care, and hopefully direct treatment for individual patients. It is critical, however, that these assessments be performed while considering the patient mix, timing of data collection (timing during the evolution of a disease process), patient characteristics, and measurement properties. The reader is referred to a more comprehensive discussion of these issues.<sup>14, 15</sup> We will briefly discuss the importance of HRQL outcomes, the types of instruments available, and how to choose a specific instrument for a specific patient population.

Quality of life includes many issues occurring in a person's life, such as health status, job satisfaction, family issues, and overall well-being.<sup>6, 7, 14, 15</sup> Since these are nonspecific, this measurement may not be the best indicator of positive or negative pharmacotherapeutic interventions made by a clinical pharmacist. Health-related quality-of-life assesses those aspects of a patient's life specifically related to physical and mental well-being. "Hard data" such as treadmill time in patients with heart failure may be of interest to clinicians, but is of little value to the patients. Frequently, "hard data" correlate poorly with the patient's actual functional status. An additional reason to add HRQL instruments to clinical outcomes measurements pertains to the phenomenon that patients with the same medical condition often respond differently to therapy. HRQL is a complementary method of measuring the impact of therapy on chronic disease. Thus, HRQL might be used in tandem with explicit or implicit quality assurance review that is measuring the process of delivering care along with clinical outcome measures (e.g., blood pressure for hypertension or peak flow measures for asthma).<sup>6</sup>

Primary care providers, patients, and health care

administrators are interested in HRQL outcomes because they are a method to measure the impact of therapy on the disease process. Hospital administrators and other policy makers have a high stake in these issues because payers are beginning to use HRQL data in their reimbursement policies.<sup>16</sup>

It is imperative that clinical pharmacists involved in providing primary patient care have a good working knowledge of HRQL instruments and are competent in choosing the appropriate methods to assess their interventions. Generic instruments and disease-specific instruments are the two general means by which HRQL can be measured.

The first modern health status questionnaires were very long, but their results were well validated. The Sickness Impact Profile (SIP) is an example of an early profile. It includes a physical dimension and a psychosocial dimension.<sup>14-18</sup> A dimension is a quality or aspect that is a component of health. The SIP also includes five independent categories including sleep, rest, eating, work, and home management, as well as recreation and pastimes. More recently, shorter profiles have been developed such as the Nottingham Health Profile and the Medical Outcomes Study (MOS) 36-Item Health Survey (SF-36) (Appendix 4).

The other approach in assessing HRQL is to focus on the aspects of health status that are specific to a particular area of interest or disease. By narrowing the area being observed, it is possible to gain increased responsiveness to changes in therapeutic interventions. Responsiveness relates to the instrument's ability to detect changes in the patient's status over time.<sup>15-17</sup> The instrument may be specific to a particular disease state (e.g., angina or arthritis), or to a population (e.g., the frail elderly), or to a physiologic problem (e.g., pain). In addition to responsiveness, these disease-specific instruments evaluate areas routinely addressed by primary care providers.<sup>17</sup>

Most generic and specific HRQL measures used today have been validated, but not in all populations. If an instrument is valid, it has been statistically determined to measure what it is intended to measure. Compendia of available measures, including critical reviews, can facilitate the choice of an instrument for a specific setting or purpose.<sup>18</sup> Appendix 4 contains some generic health profile instruments that can be used for various disease states, and, where possible, a disease-specific instrument was listed.

The Health Outcomes Institute has developed and validated several outcome instruments that can

be used to evaluate patient outcomes following interventions by pharmacists.<sup>19</sup> These include hypertension/lipids, angina, asthma, chronic obstructive pulmonary disease, chronic sinusitis, hip replacement, hip fracture, depression, low back pain, osteoarthritis, alcohol abuse, stroke, rheumatoid arthritis, and prostatism (Appendix 4). The Health Outcomes Institute is located at 2001 Killebrew Drive, Suite 122, Bloomington, MN 55425; telephone (612) 858-9188.

### Example

If pharmacists were providing primary care for hypertensive patients and wanted to compare the results of an intervention, they should first provide interventions based upon established therapeutic guidelines for treating hypertension such as those outlined by the Fifth Joint National Committee on Detection, Evaluation, and Treatment of Hypertension (JNC-V). With each patient encounter, they would collect the data in Appendix 2. These two procedures would ensure that the pharmacist is providing an appropriate process of care.

Prior to the intervention, the pharmacist would assess health outcome measures such as blood pressure, current medication adherence, and forms such as a general form (e.g., SF-36) and a disease-specific form (e.g., Hypertension/Lipid Form 5.1) (Appendix 4). After the pharmacist intervention, a predetermined period of time must elapse before these questionnaires can be repeated (e.g., 6–12 mo). The questionnaires and blood pressure assessments are then repeated and it is determined whether the intervention had any effect on the patient outcome.

### Recommendations

1. When appropriate, generic assessment measures should be used to develop methods to evaluate overall patient outcomes after pharmacists' interventions. However, since these may not be the most appropriate techniques for specific pharmacotherapy interventions, disease-specific methods should also be considered.
2. Centers or individuals who wish to evaluate patient outcomes that result from pharmacists' interventions should utilize instruments that have been developed and evaluated by experts.
3. When appropriate, patient outcomes after pharmacists' interventions and primary care activities should be assessed with disease-specific instruments that have been validated appropriately.
4. The choice of generic and/or disease-specific

instrument(s), should be made by the multidisciplinary team when patient care is being assessed.

### The Professional Relationship

Since primary care often involves an interdisciplinary team, many health care professionals provide care to the patient. Clinical pharmacists need to understand the legal implications of the care they provide, or of their patient interventions. Some of the medical-legal concepts that need to be addressed include: what establishes a professional relationship, how to terminate this relationship, abandonment, and harmful neglect. These issues are rooted in both tort and contract law. In actions of negligence, four legal elements must be addressed: duty, breach of this duty, damage, and causation.<sup>20</sup> In determining a pharmacist's duty, the central question is whether a particular conduct is a standard of pharmaceutical care. This is often quite controversial in that there may be certain activities, such as duty to warn, that are not accepted by all courts as a standard of care for pharmacists. If it is decided that the action is not a standard of care, the pharmacist cannot be held negligent. If it is, then the issues are whether the pharmacist breached that duty (standard of care), whether the patient was harmed (and to what extent), and whether the breach of duty caused the harm.

The essence of primary care is taking responsibility for the care of the patient to improve outcomes. Therefore, the following discussion is essential for the pharmacist-patient relationship in primary care.

### Duty to Care

It is the pharmacist-patient relationship that gives rise to the pharmacist's duty to care.<sup>21</sup> The pharmacist-patient relationship usually involves an expressed or implied contractual agreement whereby the pharmacist offers to treat the patient with proper professional skill and the patient agrees to pay for such treatment. The pharmacist has the responsibility for practicing all facets of the profession competently. This could involve, for example, drug distribution, providing primary care, patient monitoring, patient and provider consultation/education, and other activities. As a result, the legal principles governing contract formation apply to the establishment of the pharmacist-patient relationship. At issue, however, is whether this contractual arrangement really exists between the pharmacist and the patient or

whether it is between the pharmacist and some other entity such as the physician. The answer may depend on what the pharmacist is actually doing. If the pharmacist provides primary care functions, the contractual arrangement should be viewed as being with the patient.

### Terminating the Relationship

If a pharmacist-patient relationship exists and it is to be terminated, the pharmacist must give the patient sufficient notice so that he may secure other professional care.<sup>21</sup> Even though the pharmacist's powers in terminating the relationship are limited, the patient has broad powers in terminating the relationship. The patient is free to unilaterally terminate the relationship at any time. From the moment the pharmacist is dismissed or discharged, he is relieved of all future professional responsibility to the patient.

### Abandonment

Once established, the pharmacist-patient relationship imposes a duty of care upon the pharmacist that continues as long as attention is required, unless the pharmacist gives sufficient notice of termination or is discharged.<sup>21</sup> While this case law currently only applies to physicians, pharmacists who assume a caregiver role would also be subject to this duty. To recover on the theory of abandonment, the plaintiff must prove the following:

- a) existence of a pharmacist-patient relationship;
- b) unilateral severance by the pharmacist without reasonable notice and without providing an adequate substitute;
- c) necessity of continuing pharmaceutical attention;
- d) proximate cause; and
- e) damages.

A pharmacist is immune from the abandonment charge when the patient voluntarily chooses not to return or discharges the pharmacist.

Abandonment may thus occur in two ways: through explicit withdrawal from a case or failure to attend the patient with due diligence. If the pharmacist fails to attend the patient with due diligence, he may also be liable under negligence principles. If he prematurely terminates the relationship despite the patient's continued need for care, he may also have abandoned the patient. The pharmacist has a definite right to withdraw from the case provided he gives the patient reasonable notice so that a patient may secure

other attention. Failure by the patient to cooperate with the pharmacist may justify termination of the professional relationship by the pharmacist. The pharmacist is not justified in abandoning the patient unless the patient obstinately refuses treatment. Differences of opinion on the factors surrounding a case may occur. Therefore, it would be prudent for the pharmacist to document carefully events and to offer to obtain a substitute clinician for the patient, and even then alternative care arrangements must be made.

### Harmful Neglect

Decisions concerning frequency of patient visits are an important medical-legal issue. Pharmacists can be held liable for harmful neglect, an act of negligence involving nondiligent care of the patient. Courts have ruled, "A physician is not chargeable with neglect on account of the intervals elapsing between visits, where the injury requires no attention during the intervals, but is negligent where attention is required."<sup>22</sup>

The establishment for "proximate" or "legal" causation is the first step.<sup>23</sup> A factual link between the pharmacist's conduct and the patient's injury and whether the pharmacist could have foreseen the harm must be determined. The plaintiff must compare what did occur with what would have occurred if contrary-to-fact conditions existed. As an example, in a case involving a pharmacist, if the pharmacist had provided more frequent visits, would a more favorable outcome have resulted? The plaintiff would have to prove, by a preponderance of the evidence, that the infrequency of visits was the cause of damages to him. In addition, even if it is established that the pharmacist's conduct caused the patient's injury, a question of foreseeability may be raised. In general, unless the pharmacist could have foreseen that harm would occur, there will be no liability. The issue of foreseeability would most likely be part of the determination of duty. Many of the consensus statements and guidelines included in this paper describe appropriate intervals of follow-up that, if followed, might reduce the liability of clinical pharmacists.

The jury would be instructed not to consider a pharmacist's workload as a legitimate determination of frequency of follow-up care. Pharmacists should be aware that having more patients than time allows does not relieve them of their responsibility to provide proper follow-up care.

Pharmacists do not carry the sole burden of what

happens to their patients during intervals between appointments. Patients also have responsibilities with regard to the management of their illnesses. The Supreme Court of Maine ruled "it is the duty of a patient to follow the reasonable instructions and submit to the reasonable treatment prescribed by his physician or surgeon."<sup>24</sup> If the patient fails in his duty and his conduct directly contributes to the injury, he may be precluded from or limited in seeking damages. Some state laws provide for contributory negligence where any negligence by the plaintiff completely bans recovery. Other states have comparative negligence where blame is essentially apportioned between the plaintiff and defendant.

In summary, pharmacists' decisions regarding follow-up care are subject to legal scrutiny. As standard guidelines concerning the appropriate frequency of follow-up visits for outpatient management of most diseases are not routinely available, clinicians are vulnerable to actions for harmful neglect. Lacking such standards, a jury of laypersons listens to "expert testimony" and decides whether appropriate care was given. Busy workloads of pharmacists who service a large number of patients are not considered a defense against harmful neglect. If a practitioner cannot provide adequate care to each patient, an equally competent substitute must be named. Finally, it is essential to remember that the patient has obligations in the management of his own health. To document appropriate pharmacists' advice to patients, written instructions should be provided that clearly and specifically outline what the patient should do during intervals between visits, and full and appropriate records of patient visits must be maintained.

### Summary

This Task Force report is designed to provide administrators and pharmacy practitioners with recommendations that assist them in establishing and evaluating pharmacy services and assessing patient outcomes in ambulatory/primary care. Each setting will have unique features requiring specific processes be tailored to that institution or clinic. By utilizing the outcome instruments, practice guidelines, and other materials listed in this report, the clinician should be able to establish a valuable practice in most primary care settings.

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**Appendix 1. Application for Scope of Practice**

## Clinical Pharmacy Specialists

Name: \_\_\_\_\_  
 Position on hospital staff: \_\_\_\_\_  
 Pharmacy school(s): \_\_\_\_\_  
 Date(s) of graduation: \_\_\_\_\_  
 Graduate degree: \_\_\_\_\_  
 Graduation: \_\_\_\_\_  
 Board certified in pharmacotherapy?: Yes \_\_\_ No \_\_\_  
 Board certified in other pharmacy specialty?: Yes \_\_\_ No \_\_\_ NA \_\_\_  
 Specialty area: \_\_\_\_\_  
 States currently licensed: \_\_\_\_\_

The following are the clinical scope of practices granted to you as a member of the staff of the \_\_\_\_\_ Hospital (Clinic), located in \_\_\_\_\_ (city), \_\_\_\_\_ (state). These determinations were made through a thorough review of your education, training, and experience, and demonstrated competence by the Professional Standards Board and approved by the Director. If you change positions and/or if your duties change (i.e., a geriatric clinical pharmacist moves to medical oncology), then you must reapply for practices specific to that area.

## Areas of Practice:

A = Ambulatory Care

A. Routine duties: Routine duties are defined as those duties that are performed on a regular, repetitive basis.

(1) Category A-1: Routine duties that require review by the physician supervisor who will note concurrence or addendum as indicated. Countersignature of the medical record is required within 24 hours.

	Requested
• taking and recording verbal orders from physicians	_____ A _____

(2) Category A-2: Routine duties that do not require review by the physician supervisor unless so indicated. These duties will be reviewed by the physician supervisor on a regular basis through a random sampling process. Results of this review will be discussed with the clinical pharmacist as appropriate.

	Requested
• provision of formal written consultations upon request in the areas of pharmacotherapy and pharmacokinetics	_____ A _____
• provision of written initial assessments in the progress notes	_____ A _____
• provision of follow-up notes within the progress notes	_____ A _____
• taking medication/therapeutic histories	_____ A _____
• measuring vital signs and performing physical examinations of relevant organ systems for the purpose of monitoring drug therapy	_____ A _____
• collecting laboratory specimens (i.e., drawing blood)	_____ A _____
• order the following noninvasive tests:	
(a) laboratory tests (e.g., PT, CBC)	_____ A _____
(b) EKGs	_____ A _____
(c) Holter monitors	_____ A _____
(d) PFTs	_____ A _____
(e) echocardiograms	_____ A _____
(f) x-rays (e.g., CXR)	_____ A _____
• order appropriate consultations from the following services:	
(a) dental	_____ A _____
(b) dietetics	_____ A _____
(c) medical specialties	_____ A _____
(d) psychiatry	_____ A _____
(e) psychology	_____ A _____
(f) radiology	_____ A _____
(g) social work	_____ A _____
(h) surgical specialties (old problems)	_____ A _____

**Appendix 1. Application for Scope of Practice (continued)**

**B. Non-Routine/Non-Emergency Duties:**

	Requested	
• authority to write prescriptions for medication refills for medical problems that are stable in patients followed in outpatient clinics. The clinical pharmacist is not authorized to write prescriptions that are used to initiate any form of drug therapy.	<u>    A    </u>	
• authority to make adjustments in dosage as clinically indicated for a period of up to 3 months between physician visits using the following classes of drugs:		
1. antihistamine drugs	<u>    A    </u>	
2. antiinfective agents	<u>    A    </u>	
3. antineoplastic agents	<u>          </u>	{indicates not applicable to this ambulatory care pharmacist}
4. autonomic drugs	<u>    A    </u>	
5. blood formation and coagulation	<u>    A    </u>	
6. cardiovascular drugs	<u>    A    </u>	
7. central nervous system agents	<u>    A    </u>	
8. gastrointestinal drugs	<u>    A    </u>	
9. hormones and synthetic substitutes	<u>    A    </u>	
10. respiratory smooth muscle relaxants	<u>    A    </u>	
• limited authorization to approve the use of restricted or nonformulary medications when the use of such agents is within the established guidelines or approved criteria for use at this facility (i.e., antibiotics, chemotherapy)	<u>    A    </u>	

**C. Emergency Duties:** Carried out for patients in life-threatening situations where a physician is not immediately available. The clinical pharmacist initiates this activity but makes every effort to summon a physician as soon as possible (i.e., cardiopulmonary resuscitation, and, if advanced cardiac life support-certified, electrodefibrillation).

**D. Miscellaneous Duties:** Those duties that do not fall into the first category.

- conduct clinical research protocols     A

I do hereby request the above outlined scope of practices. I have read and agree to abide by the bylaws of the \_\_\_\_\_ Hospital.

Signature of applicant \_\_\_\_\_ Date \_\_\_\_\_

Signature of physician supervisor \_\_\_\_\_ Date \_\_\_\_\_

Chief, Pharmacy Service \_\_\_\_\_ Date \_\_\_\_\_

Chief of Staff \_\_\_\_\_ Date \_\_\_\_\_

Director \_\_\_\_\_ Date \_\_\_\_\_

**Appendix 2. Evaluating Process of Care: Example Quality Assurance in Primary Care**

Medical Records will be reviewed on a quarterly basis. Twenty-five charts will be randomly selected and reviewed for the following items:

1. Progress notes written in an appropriate S.O.A.P. format.
2. Determine if the subjective and objective information is consistent with the assessment and plan.
3. Past medical history and family history is obtained at least once for each patient.
4. Social, diet, and exercise history is recorded at least every 4 months.
5. Medication history recorded at least once.
6. Current prescription and nonprescription medication recorded on each visit.
7. Compliance is assessed on each visit.
8. Each visit contains thorough questioning concerning disease control, signs or symptoms of disease progression or new complications, and signs or symptoms of adverse reactions.
9. Each visit documents appropriate objective information such as laboratory, physical assessment data, vital signs, etc.
10. All patient counseling concerning drug therapy, compliance, diet, exercise, and other lifestyle factors are recorded.
11. Therapeutic goals are clearly stated.
12. Appropriate recommendations and drug regimen changes are made and documented in the plan.
13. Documentation of any actions that are beyond the scope of practice that were authorized by a physician.
14. Appropriate timing of follow-up visit is included in every plan.

**Appendix 3. Treatment Guidelines and Review Articles****Hypertension Guidelines**

1. The fifth report of the Joint National Committee on Detection, Evaluation, and Treatment of High Blood Pressure (JNC V). *Arch Intern Med* 1993;153:154-83.
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**Hyperlipidemia Guidelines**

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**Appendix 3. Treatment Guidelines and Review Articles (continued)**

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## Coronary Artery Disease Guidelines

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## Asthma/Chronic Obstructive Pulmonary Disease Guidelines

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**Appendix 4. Bibliography on Patient Outcomes Measurement**

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**Hyperlipidemia Outcomes**

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