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December 26, 2011

Dr. Robert Marier  
P.O. Box 30250  
New Orleans, LA 70190-0250

**By Electronic Mail**

**Re: Comments on the Senate Resolution 81(2011) Legislative Workgroup Report**

Dear Dr. Marier:

The Pharmaceutical Research and Manufacturers of America (PhRMA) is pleased to respond to the Louisiana Legislative Workgroup on E-prescribing's ("Workgroup") request for comments related to the proposed committee report. PhRMA is a voluntary, non-profit organization representing the nation's leading research-based pharmaceutical and biotechnology companies, which are devoted to inventing medicines that allow patients to lead longer, healthier, and more productive lives.

Recognizing the importance of e-prescribing, PhRMA has worked extensively to develop guiding principles for e-prescribing systems that will ensure that any system contains decision support and quality standards that are integrated into a fully functional electronic health record (HER) system. We believe the best way to conduct e-prescribing is through a full EHR in the context of integrated health information exchanges (HIEs). In brief, PhRMA's principles are:

1. An e-prescribing system should be designed to improve patient care and strengthen the physician-patient relationship.
  - Put the patient first.
  - Protect patient privacy.
  - Promote physician-patient communication.
  - Preserve the physician's choice/ physician's role.
  
2. An e-prescribing system should provide information when it is needed.
  - Provide the information needed by physicians.

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- Provide the information needed for beneficiary protection.
  - Should be a function of a full EHR so that the prescriber has access to the patient's complete medical record.
3. An e-prescribing system should be designed to reduce the overall cost of health care.
- Consider the full range of cost savings.
  - Provide a neutral and balanced platform.
  - Provide value to all parties using the system.
  - Cover the entire prescribing process.

### **Maximizing Patient Safety**

Well-structured E-prescribing systems are tools that increase patient safety and efficiency. They should not be reduced to tools for arbitrary cost-cutting through limitations on a patient's access to needed medicines. Instead, E-prescribing standards should focus on patient access, an increase in efficiency and safety, and facilitating savings overall. E-prescribing standards should promote a system design that serves to maximize all the potential savings available through the improvements in patient safety, quality of care, and cost-effectiveness. For example, using drug therapies more effectively will reduce inpatient admissions, which result in cost savings throughout the health care delivery system. Eliminating fraud and abuse likewise will reduce overall health care costs.

### **Safeguarding Prescriber Authority**

Preserving the physician-patient decision-making authority should be the focal point for all decisions regarding drug treatment regimens and should be held at a premium when developing an E-prescribing system. States should establish a uniform form for plans to provide physicians seeking authorization for a covered drug, including a uniform, streamlined process for handling requests for expedited review for urgent or medical emergencies. It is essential to patient safety that necessary medicines are received in a quick and efficient manner.

### **Seek to Engage all Stakeholders in Development to Ensure System Integrity**

PhRMA strongly believes that there must be adequate stakeholder input and review of any proposed E-prescribing system. While moving forward is important, it should occur with the goal of creating the soundest system possible. Moving forward without the necessary time for thoughtful discussion and comments could jeopardize the integrity of the system. We are concerned about the lack of a follow-up meeting to the August 19, 2011 preliminary meeting.

We believe that a subsequent meeting should be convened to all stakeholders to discuss the findings of the committee.

We appreciate your consideration of our comments. Please feel free to contact us with any questions.

Sincerely,

Kristin Parde  
Senior Director