Quality Assurance (QA) & Prescription Dispensing Occurrence (PDO) Policies and Procedures

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Why do we need QA & PDO Policies and Procedures?

1) Our customers and patients need and deserve to receive the correct medications in a timely manner – every single time;

2) To establish an infrastructure and culture that are built on the need to deliver absolute quality;

3) To measure our performance relative to quality, accuracy and timeliness so that we can continuously improve; and

4) It’s the only way that we can become the best LTC pharmacy in the world!
QA and PDO Training

• All Millennium Pharmacy Systems employees will be trained on our Quality Assurance (QA) and Prescription Dispensing Occurrence (PDO) Policies and Procedures, including:
  – PDO Definition and Classifications
  – Policies & Procedures Concerning:
    • Reporting & Documentation
    • Tracking
    • Review
    • Prevention
What is a Prescription Dispensing Occurrence (PDO)?

A PDO is a departure from perfection …

A PDO is any preventable event occurring during the receipt, processing, dispensing, distribution and/or monitoring of prescription medications by Millennium Pharmacy Systems that may cause or lead to inappropriate medication use or patient harm.
PDO Classifications

Class A: Occur upon the customer and/or patient’s receipt of a prescription that contains a serious error but which are discovered and corrected prior to the patient’s utilization of the medication. Examples of Class A PDOs include:

- Wrong drug or strength
- Wrong directions (SIG)
- Wrong patient name
- Wrong drug delivery form (e.g., IR vs. XL release)
- Delivery of an expired or deteriorated medication

Since the patient has not ingested the medication there is no impact or potential impact to the patient’s health and safety other than a temporary delay in therapy.
PDO Classifications (continued)

Class B: Occur upon the customer’s and/or patient’s receipt and consumption or utilization of a medication that contain serious errors. Examples of Class B PDOs include:

- Wrong drug or strength
- Wrong directions (SIG)
- Wrong patient name
- Wrong drug delivery form (e.g., IR vs. XL release)
- Delivery of an expired or deteriorated medication

Since the patient has ingested or utilized the medication, this is the **most serious** class of PDO without regard to whether or not the patient experienced an adverse impact to their health.
Reporting PDO’s

• **Q:** Who is responsible for reporting PDOs?
  **A:** Every Millennium Pharmacy Systems employee!

• All PDOs, or suspected PDOs, must be *immediately* reported by the discovering employee to the Pharmacist in Charge (PIC) (otherwise known as the General Manager) at the pharmacy which dispensed the medication:
  – Cranberry Township Pharmacy – Jeff DeLeonardis, RPh
  – Hatfield Pharmacy – Sherry Palmeri-Lubonski, RPh
  – Lima Pharmacy – Christopher Grant, RPh
  – Columbia Pharmacy – Jeffrey Newell, RPh
  – Orlando Pharmacy – Ever Taylor, RPh
  – Charlotte Pharmacy – Zakery Freese, RPh
  – Mechanicsburg Pharmacy – Gamal Ali, RPh

If it’s not clear where the PDO was generated or there are general questions surrounding submission of the PDO, contact should be made to Amy Orozco, Manager Pharmacy Audit & Compliance
Completing the PDOR Form

- PDOs may be reported through the CRM system (preferred) or by completing a PDOR Form (example shown at left) for external communication.

- Internal reporting should be done through the CRM ticketing system only. This needs completed AS SOON AS A PDO IS DISCOVERED.

- Be as complete as possible.

- Immediately inform (via call or e-mail if necessary), the PDO information to the Pharmacist in Charge (PIC)/General Manager at the appropriate pharmacy.

- If the appropriate pharmacy is not clear, please consult with Amy Orozco, Manager Pharmacy Audit and Compliance.

- Other Department contacts with the potential for PDOs include:
  - Janae McAfee, RPh – Data Entry and Control Acquisition
  - Jerry Kilkelly – Customer Service
  - Richard Imhoff, RPh – Transition Services
Tracking and Review

• All PDO Reports will immediately be reviewed by the appropriate Pharmacist in Charge/Department Manager or his/her appropriate designee

• The Pharmacist in Charge/Department Manager will investigate the PDO:
  – Immediate correction of the error with the customer and patient
  – Root cause analysis
  – Preventative action plan
  – Communication of the error to the team
  – Formal PDO report to the customer, whether or not there was a PDO discovered after research
Tracking and Review (continued)

• All Class A and Class B PDOs will be statistically reviewed by the Pharmacy Operations Management Team a minimum of once per quarter.

• The Pharmacy Operations Management Team includes all Millennium Operational management, manager level and above.

• The Pharmacy Operations Management Team will:
  – Statistically review all Class A and Class B PDOs
  – Look for trends and root causes
  – Develop and implement corrective / preventative action plans
PDO Prevention

- We will attempt to understand the root cause of all PDOs
- We will learn from our mistakes and will continuously improve
- We will appropriately review all relevant Class A and Class B PDOs with the employees in the pharmacy network
- We will re-train all employees, as appropriate
- We will aggressively implement corrective and/or preventative measures to limit future PDOs of the same nature
- All Millennium Pharmacy Systems employees are responsible for continuous improvement, not just the Pharmacy Operations Management Team.