

June 3, 2016

Dr. Mark R. Chassin, MD, FACP, MPP, MPH

President and Chief Executive Officer

The Joint Commission

One Renaissance Blvd.

Oakbrook Terrace, IL

60181

Re: TJC's approval of texting platforms as a means of communicating patient orders

Dear Dr. Chassin,

As an organization committed to advocating for healthcare consumers and the nursing profession, Oncology Nursing Society (ONS) is writing to express concern with the revision to The Joint Commission's (TJC) position on the transmission of patient care orders via texting platforms. Despite the acknowledged advances in the security of texting platforms addressing the concerns of provider anonymity, use of personal cellular devices, and the process for including orders into the medical record, severe safety concerns remain with the use of even the most advanced texting platforms.

One significant concern is the opportunity to bypass essential safeguards when communicating patient orders. ONS urges TJC to consider the positive impact computerized order entry and order sets demonstrate on reducing medication errors and integrating patient safety alerts into care. Use of electronic order entry and order sets identify and prevent errors in medication name and dose, conflicts with allergies, and problematic drug-drug interactions. Furthermore, they ensure patient identifiers are a component of orders, prohibit the use of unapproved abbreviations, clearly relay medication indication, and provide a seamless process for verification of orders and incorporation into permanent medical records. Another concern is that of user and platform error leading to miscommunication and misinterpretation of patient care orders. Spelling errors and autocorrect features may compromise the integrity of the intended order resulting in errors and patient harm – especially when medication-related orders, particularly those related to antineoplastics, are involved.

Utilization of computerized order entry programs and compliance with current Joint Commission Medication Management Standards drastically reduce the risk for error and ensure patient safety surrounding the communication of patient care orders. Therefore, ONS strongly urges that healthcare institutions be prohibited from texting any patient care orders at this time. We understand from the May 2016 Update in The Joint Commission Perspectives®, that TJC is in the process of further refining expectations for healthcare institutions who may be developing policies and procedures surrounding transmitting patient orders via texting platforms. This would be extremely helpful in providing the additional clarity necessary surrounding the expectations and standards of what texted orders must

include, how compliance can be ensured, and the recommendations for implementation of a risk management strategy. ONS further advocates that nurses be an integral part of the decisions made regarding the use of texting as a means of transmitting orders, as they are paramount to ensuring order accuracy and clarity, and that patient safety considerations are met.

Finally, ONS has a particular vested interest in the safety surrounding the prescribing, administration, and monitoring of antineoplastic agents. Per the ASCO/ONS Chemotherapy Administration Safety Standards, verbal orders surrounding antineoplastic agents are unacceptable, and should be used only in emergent situations with regard to holding or stopping doses. Because TJC refers administrators to recommendations regarding verbal orders when considering use of texting orders, ONS would strongly contend that texting any orders related to antineoplastic agents be prohibited in all scenarios.

Many thanks in advance for your time and consideration, and please do not hesitate to reach out to us at ONS should you have any questions or comments regarding this communication.

Best Regards,

Dr. Susan Schneider, RN, PhD, AOCN, FAAN