

TO: [CMS REPRESENTATIVES]
FROM: NATIONAL MTM ADVISORY BOARD
SUBJECT: DRUG THERAPY PROBLEM DEFINITION
DATE: SEPTEMBER 16, 2013
CC: [MEMBERS OF NATIONAL MTM ADVISORY BOARD]

Comprised of payor and provider representatives from the Medication Therapy Management (MTM) industry nationwide, the National MTM Advisory Board has released its definition of a drug therapy problem, also known as a medication-related complication or medication-related problem (MRP).

The definition of a drug therapy problem has been a focus of several MTM industry discussions in recent months, specifically in the area of quality measure development where a standardized definition is important for accurate reporting and benchmarking. The National MTM Advisory Board's definition of a Drug Therapy Problem (DTP) is:

A Drug Therapy Problem (DTP) is an event or circumstance involving a medication, or lack thereof, that actually or potentially interferes with the optimal therapeutic and/or economic outcome(s) of the medication. A DTP is specifically defined by one of the following categories:

1) Indications

- a. **Needs therapy:** the patient has a medical condition that requires drug therapy but is not taking a medication for that indication
- b. **Unnecessary therapy:** the patient is taking a medication for which there is no valid medical indication or duration of therapy is too long

2) Efficacy

- a. **Suboptimal drug:** the patient has a medical condition for which a suboptimal drug has been prescribed
- b. **Dose too low:** the patient has a medical condition and is taking a dose of a medication that is too low to achieve optimal results from the medication
- c. **Cost efficacy:** the patient is taking a medication for a medical condition for which a less expensive, equally safe and effective medication is available

3) Safety

- a. **Adverse drug reaction:** the patient is experiencing an unfavorable outcome or side effect from a medication used to treat a medical condition
- b. **Drug interaction:** the patient is taking a medication for a medical condition that interacts with another medication the patient is taking or another medical condition

- c. **Dose too high: the patient has a medical condition and is taking a dose of a medication that is too high and is resulting (or is likely to result in unfavorable outcomes.**
- 4) Adherence**
- a. **Overuse: the patient is taking the correct medication for a medical condition but is taking the medication more frequently than directed**
 - b. **Underuse: the patient is taking the correct medication for a medical condition but is not taking the medication as frequently as directed (examples of barriers to adherence may include medication cost, adverse reactions, lifestyle, etc.)**
 - c. **Inappropriate administration: the patient is taking the correct medication for a medical condition but is not properly administering the medication to achieve the optimal therapeutic outcome**

This definition reinforces and builds upon the original eight categories of drug therapy problems classified by Strand et al. in 1990.

The National MTM Advisory Board wishes to thank CMS for consideration of this matter and welcomes further dialogue, as desired.

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