



HARC X  
Oct. 22, 2018

**Improving Prescription  
Medication Labels to Help Patient  
Understanding and Adherence  
*through implementation of USP  
standards for patient-centered labels***

# Our panel



Joanne Schwartzberg, M.D.  
Moderator  
Scholar In Residence ACGME  
Chair, USP Health Literacy Expert Panel



Steven Sparks  
MS  
Wisconsin Health Literacy



David Mott  
PhD, FAPhA, RPh  
UW School of Pharmacy

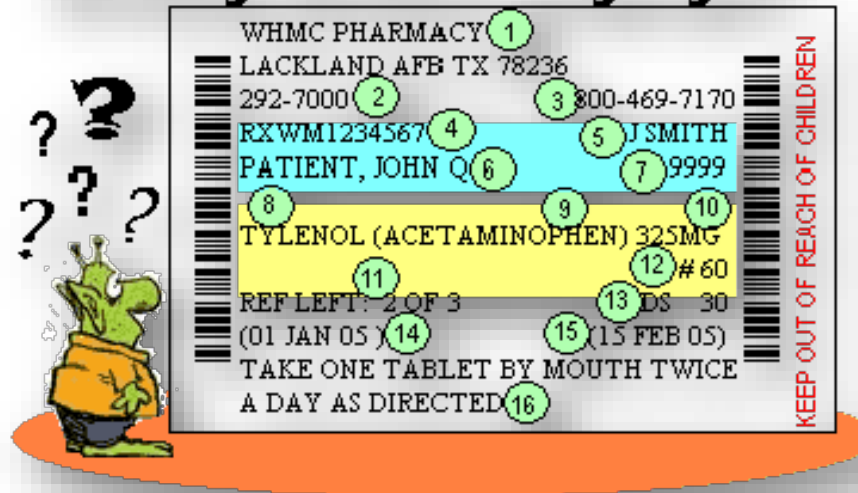
# Introduction

Medication misuse has resulted in more than 1 million adverse drug events per year in the United States

Patients' best source (and often only source) of information regarding the medications they have been prescribed is on the prescription container label

# The problem: Prescription confusion

**When Reading Your Prescription Label, Do you Feel Like You're Reading Another Language?**



The image shows a cartoon alien character on the left, looking at a prescription label with a confused expression. Several question marks are floating around the alien. The prescription label is a rectangular box with a white background and a red border. It contains the following text: "WHMC PHARMACY", "LACKLAND AFB TX 78236", "292-7000", "800-469-7170", "RXWM1234567", "J SMITH", "PATIENT, JOHN Q.", "9999", "TYLENOL (ACETAMINOPHEN) 325MG", "# 60", "REF LEFT: 2 OF 3", "DS 30", "(01 JAN 05)", "(15 FEB 05)", "TAKE ONE TABLET BY MOUTH TWICE A DAY AS DIRECTED". The label also features two vertical barcodes and the text "KEEP OUT OF REACH OF CHILDREN" written vertically on the right side. Sixteen green circles with numbers 1 through 16 are placed over various parts of the label, indicating points of confusion. The alien character is a green, three-eyed creature with a large head and a small body, wearing a yellow shirt and blue pants.

WHMC PHARMACY 1  
LACKLAND AFB TX 78236  
292-7000 2 3 800-469-7170  
RXWM1234567 4 5 J SMITH  
PATIENT, JOHN Q. 6 7 9999  
8 9 10  
TYLENOL (ACETAMINOPHEN) 325MG  
11 # 60  
REF LEFT: 2 OF 3 12 DS 30  
13 (01 JAN 05) 14 (15 FEB 05)  
TAKE ONE TABLET BY MOUTH TWICE  
A DAY AS DIRECTED 16

KEEP OUT OF REACH OF CHILDREN

# Why does prescription container labeling matter?

- Adverse drug events (ADEs):
- 3.6 million office visits
- 700,000 emergency room visits
- 117,000 hospitalizations
- Lack of universal standards for labeling on dispensed prescription containers is a root cause for patient misunderstanding, non-adherence, and medication errors

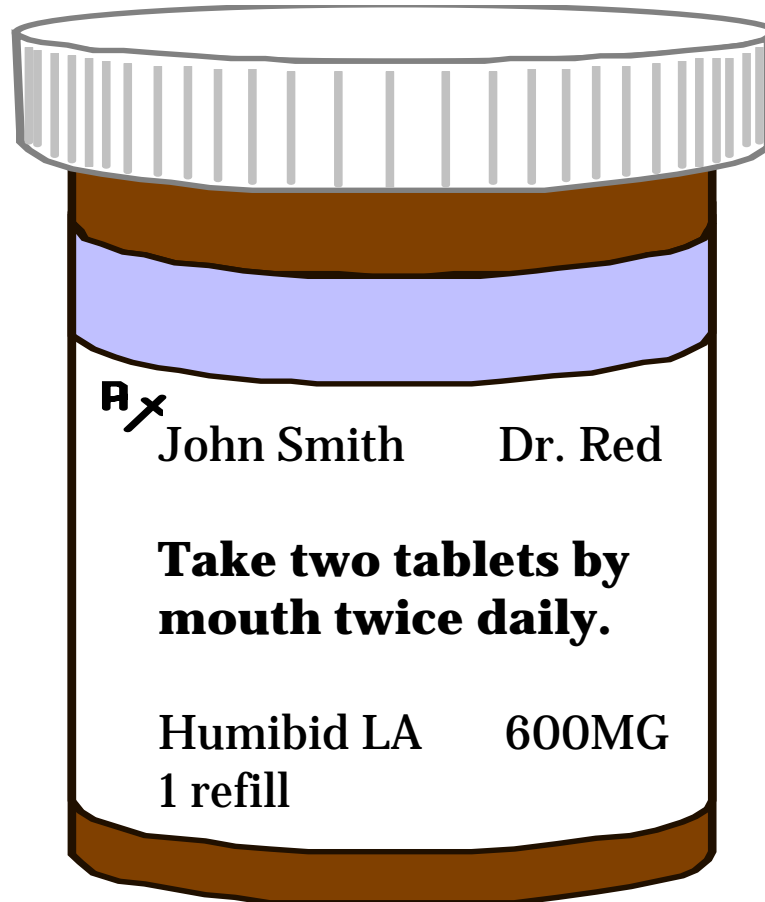
# “How would you take this medicine?”

395 primary care patients in 3 states



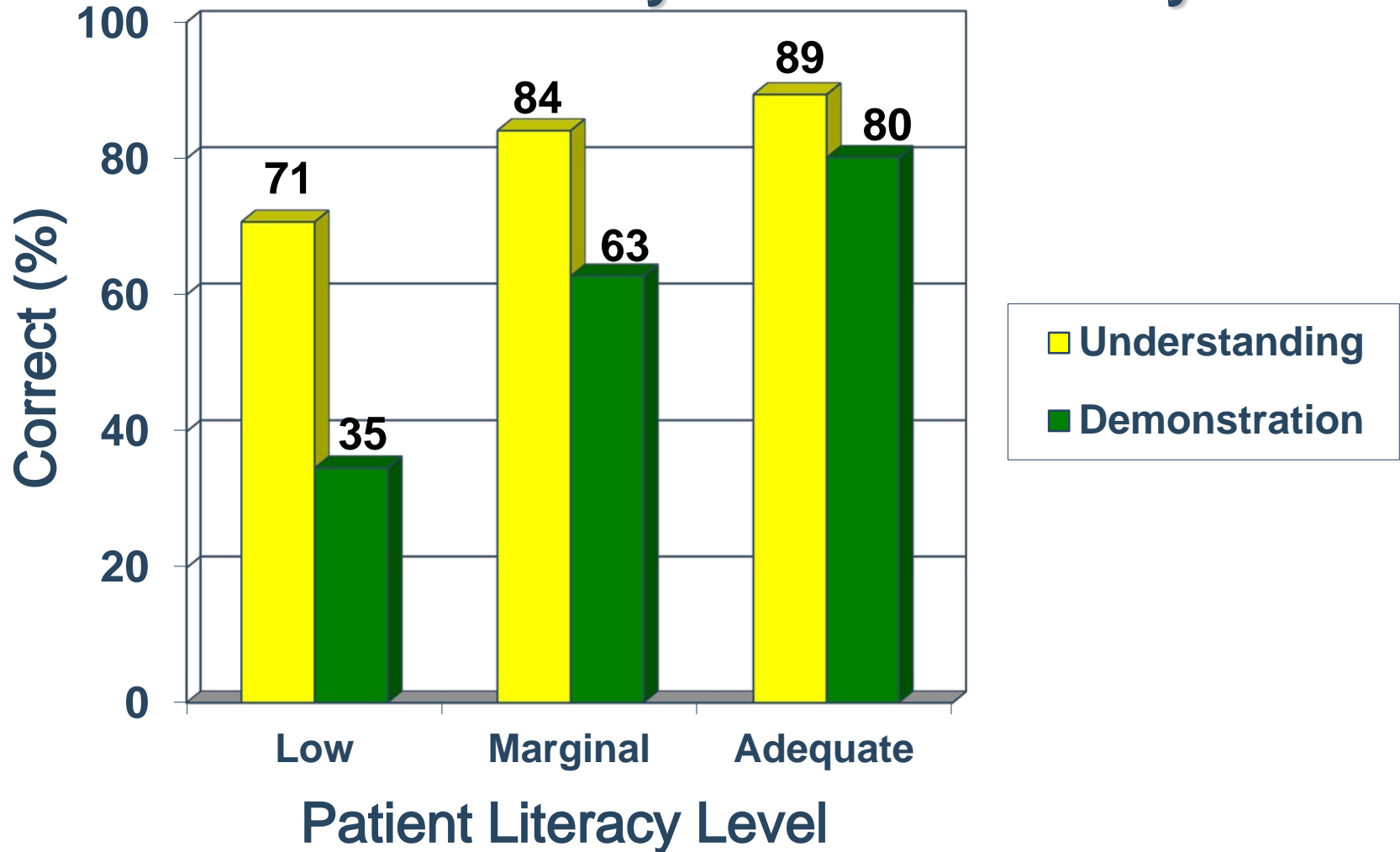
- **46%** did not understand instructions  $\geq 1$  labels
- **38%** with adequate literacy missed at least 1 label

“Show me how many pills you would take in 1 day”



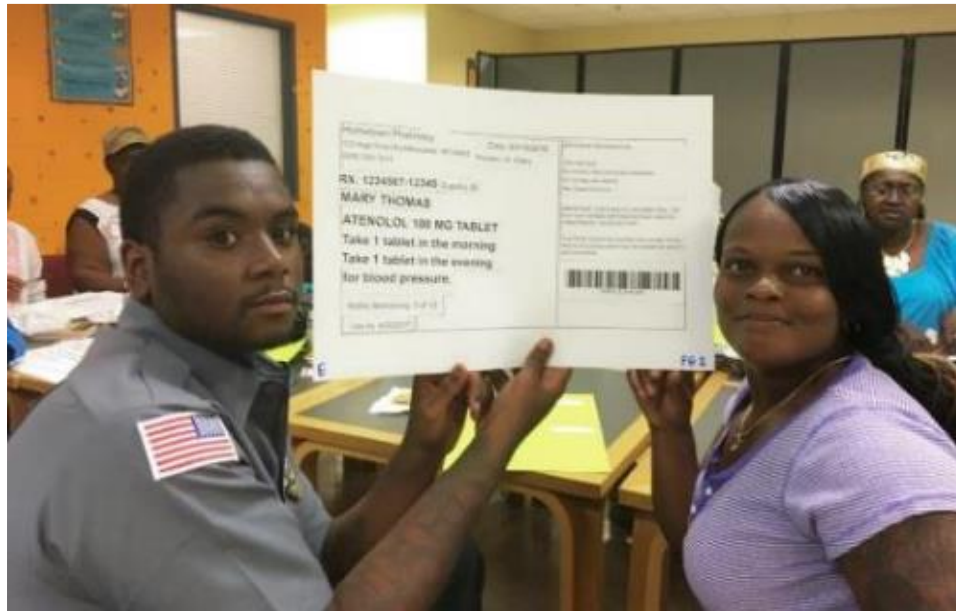
# Rates of **Correct** Understanding vs. Demonstration

## “Take Two Tablets by Mouth Twice Daily”





# Listening to patients



Focus groups

# Patient Advisory Council




# Listening to patients




“What is your favorite label” survey

Label A

<b>Hometown Pharmacy</b> 123 High Point Rd Milwaukee, WI (414) 555-1212			<b>IMPORTANT INFORMATION</b> Call your doctor for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088
<b>MARY THOMAS</b> <b>ATENOLOL 100 MG TABS</b> Sandoz Pharmaceutical	03/19/2016		<b>IMPORTANT: USE EXACTLY AS DIRECTED. DO NOT SKIP DOSES OR DISCONTINUE UNLESS DIRECTED BY YOUR DOCTOR.</b>
<b>30</b> <b>TAKE ONE PILL TWICE DAILY</b> NDC: 0603-4211-32 RPh L Wagner	<b>Refills 3</b> Bin 04-613		<b>TAKE WITH FOOD. DO NOT DRIVE AFTER TAKING THIS MEDICATION. DO NOT TAKE WITH ALCOHOL. MAY CAUSE DIZZINESS</b>
<b>RX: 1234567-12345</b>	<small>Caution: Federal law prohibits the transfer of this drug to any person other than the patient for whom it was prescribed.</small>		
Expires 3/19/2017			

Label B

<b>MARY THOMAS</b>	Date: 03/19/2016	<b>TAKE WITH FOOD</b>
Take 1 tablet in the morning. Take 1 tablet in the evening.		<b>MAY CAUSE DIZZINESS</b>
<b>ATENOLOL 100 MG TABLET</b>		<b>DO NOT TAKE WITH ALCOHOL</b>
Quantity 28		<b>DO NOT DRIVE WHILE TAKING THIS MEDICINE</b>
<b>RX: 1234567-12345</b>	Refills Remaining: 3 of 12	<small>See back</small>
<b>Hometown Pharmacy</b> 123 High Point Rd Milwaukee, WI 55443 (608) 555-1212		<small>NDC: 28034011-02</small> <small>Caution: Federal law prohibits use of this medication by anyone other than the patient for whom it was prescribed.</small>
Use by: 4/20/2017 Dr. Ellery		 39123439

# What patients like, don't like

What Patients like	What patients don't like
Color, bolding, large font	Info for pharmacists
White space	Confusing dates
What drug is for	Addresses
Most important info at top	Clutter
Name of medicine	Unclear directions (twice daily)
Prescriber name	All capital letters
	Pharmacy info at top

# Other patient concerns

- Believe generic drugs are not as powerful and for the “poor”
- Concerned those with low literacy may not be able to read any label
- Auxiliary labels: unfamiliar term

# Other stakeholder input

- Project Advisory Council
- Pharmacy Survey (n=400)
  - 85% favored adoption
  - 61% want to see adoption in their place of work



# USP Patient-Centered Medication Label Standards



# Changing Prescription Medication Use Container Instructions to Improve Health Literacy & Medication Safety

12 October 2007 IOM Roundtable on Health Literacy  
Workshop





# IOM Workshop Summary

- Container label is the patient's most tangible source of information about prescribed drugs and how to take them
- Container label is a crucial line of defense against medication errors and adverse drug effects
- **46%** of patients across all levels of literacy misunderstood 1 or 2 dosing instructions\*
- **54%** misunderstood one or more auxiliary warnings\*
- Workshop convened to address how prescription labels affect patient safety and how to address identified problems

# USP Headquarters, Rockville, MD



# Setting Drug Standards

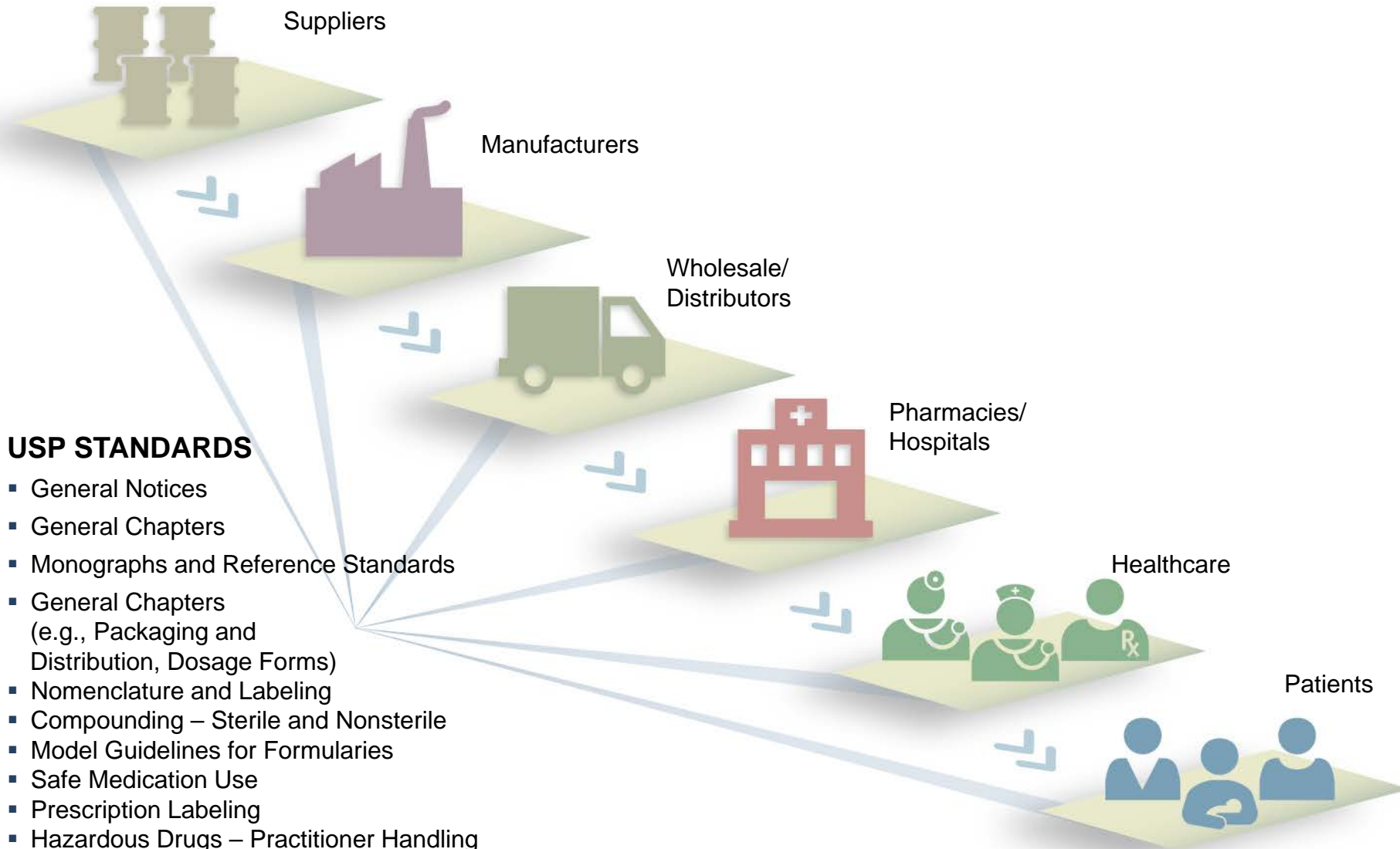
USP, founded in 1820, is a scientific non-profit organization that sets standards for the identity, strength, and purity of medicines, food ingredients and dietary supplements manufactured, distributed and consumed worldwide

# Setting Drug Standards

- USP standards are developed and revised by more than 1000 volunteer experts on 23 committees, including international participants, who work with USP under strict conflict-of-interest rules.
- USP's drug standards are enforceable in the US by the Food and Drug Administration, and those standards are used in over 140 countries.



# USP Standards: Ensuring Quality Medicine Reaches Every Patient



# Lack of Universal Standards

**May 18, 2007:**

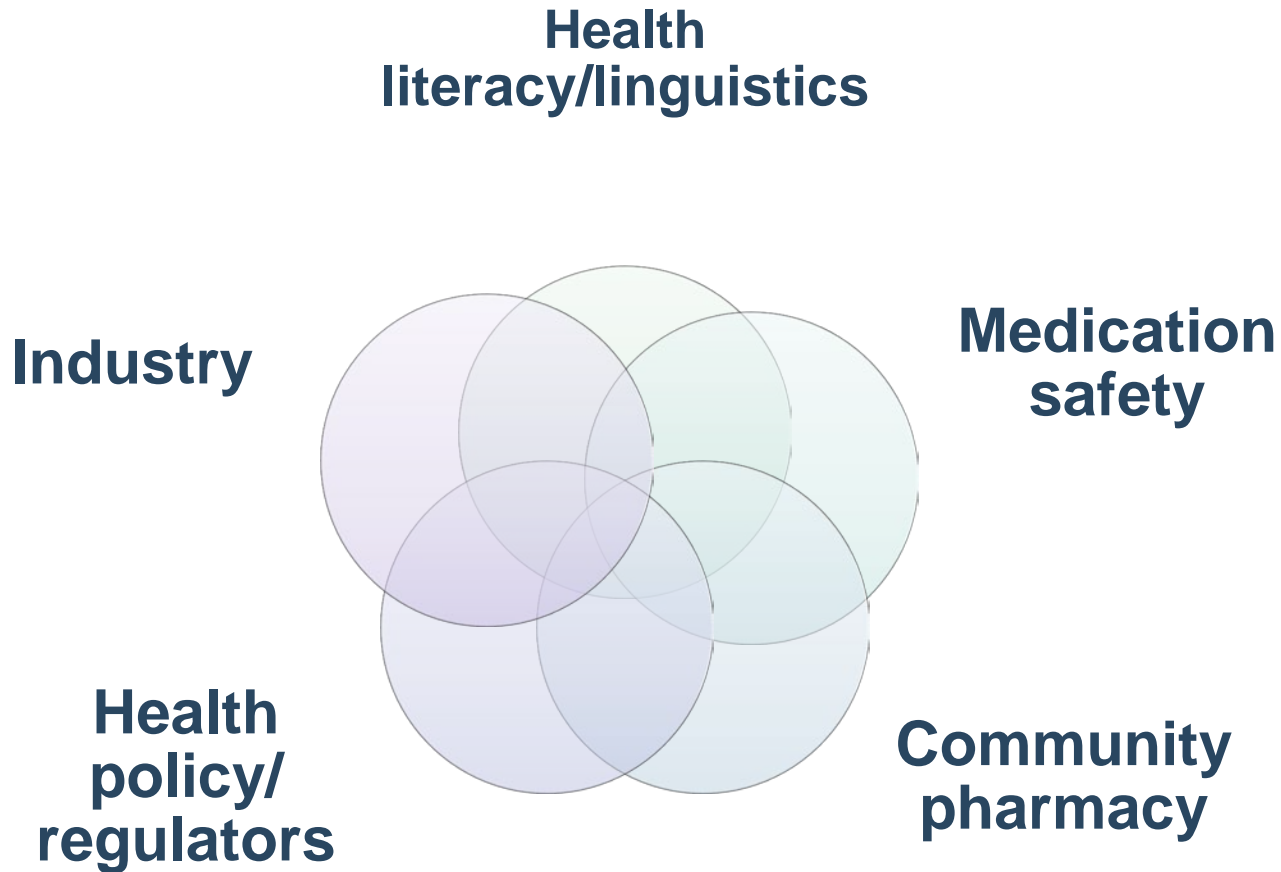
The USP Safe Medication Use Expert Committee established an Advisory Panel to:

- Determine optimal prescription label content and format to promote safe medication use by critically reviewing factors that promote or distract from patient understanding of prescription medication instructions
- Create universal prescription label standards for format/appearance and content/language

# USP Expert Panel Members

- Co-chair Gerald McEvoy, Pharm D. Co-chair
- Co-chair Joanne G. Schwartzberg, MD
  
- Cynthia Brach (AHRQ Health Policy Researcher)
- Sandra Leal, Pharm.D., CDE (Community Pharmacy Practitioner/IOM Bilingual Advisor)
- Linda Lloyd M.Ed. (HRSA Health Literacy Expert)
- Melissa Madigan, Pharm.D., J.D. (Policy - NABP)
- Dan Morrow, Ph.D. (Academia/Researcher)
- Ruth Parker, M.D. (Health Literacy Expert/Practitioner)
- Cynthia Raehl, Pharm.D., FASHP, FCCP (Academia/Practitioner)
- William Shrank, M.D., MSHS (Academia/Practitioner)
- Patricia Sokol, RN, J.D., (AMA - Medication Safety Expert)
- Darren Townzen, R.Ph., MBA (Community Pharmacy/NCPDP)
- Jeanne Tuttle, R.Ph. (Health System Practitioner/Researcher)
- Joan E. Kapusnik-Uner, Pharm.D., FCSHP (Data Industry)
- Michelle Weist, Pharm.D., BCPS (Health System Practitioner/CPOE Expert)
- Michael Wolf, Ph.D., MPH (Health Literacy Researcher)

# Expert Panel Composition



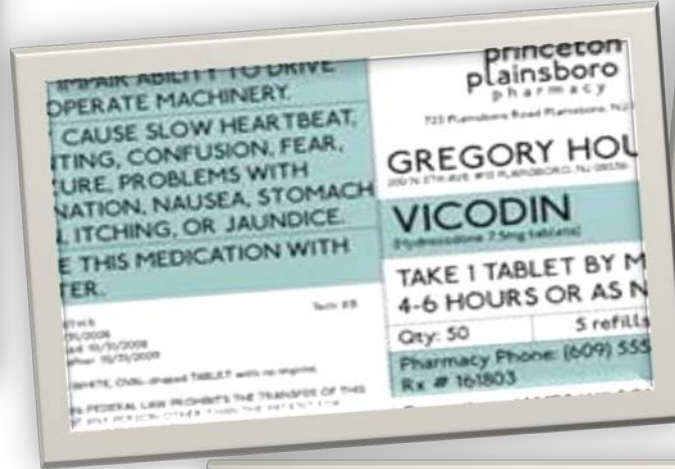


# Health Literacy: <17>

## *Prescription Container Labeling*

- Published in USP-NF November 2012
- Official May 2013
- Revision published February 2016
  - Access for visually impaired
  - Endorsement of the Universal Medication Schedule
  - Endorsement of metric units and associated dosing components for oral liquids
- 2018 revision underway
  - Strengthen metric standard
  - Syringe –only use for oral liquid doses under 10mL
  - Label specifications for implementation
- California, New York, Utah, Texas\* and Wisconsin have evaluated / use of patient centered label

# Journey to a patient-centered label



<p>Do not drink alcoholic beverages while taking this medicine</p> <p>Carry or wear medical identification stating you are taking this medicine</p> <p>You should avoid prolonged or excessive exposure to direct and/or artificial sunlight while taking this medicine</p>	<p>Michael Wolf 04/29/71</p> <p>Glyburide 5mg</p> <p>Take for Diabetes</p> <p>Take: 2 pills in the morning 2 pills in the evening</p> <table border="1"> <thead> <tr> <th>Morning 7-9 AM</th> <th>Noon 11-1 PM</th> <th>Evening 4-6 PM</th> <th>Bedtime 9-11 PM</th> </tr> </thead> <tbody> <tr> <td>2</td> <td></td> <td>2</td> <td></td> </tr> </tbody> </table>	Morning 7-9 AM	Noon 11-1 PM	Evening 4-6 PM	Bedtime 9-11 PM	2		2		<p>Rx# 1234567      9/8/2009</p> <p>You have 11 refills 180 pills Discard after 9/8/2010</p> <p>Provider: RUTH PARKER,MD Emory Medical Center (414) 123-4587</p> <p>Pharmacy:NOVA Scripts Central 11445 Sunset Blvd. Reston, VA (713) 123-4567</p> <p>NDC # 1234567</p>
Morning 7-9 AM	Noon 11-1 PM	Evening 4-6 PM	Bedtime 9-11 PM							
2		2								

4.625"

# Prescription Label Organization (Patient-centered Manner)

- Patient-directed information must be organized in a way that best reflects how most patients seek out and understand medication instructions
- Prescription container labeling should feature only the most important patient information needed for safe and effective understanding and use

# Simplify language

- Language on the label should be:
  - Clear
  - Simplified
  - Concise
  - Familiar

to promote correct understanding of instructions by patients

- No medical jargon
- Use the language in a standardized manner
- Sentence case (**Take 1 tablet by mouth every day**)
- Do NOT use all capital letters:
  - Such as TAKE 1 TABLET BY MOUTH EVERY DAY

# Give explicit instructions

- Instructions for use (i.e., the SIG or signature) should clearly:
  - separate the dose itself from the timing of each dose
  - to convey the number of dosage units to be taken and the timing
- Use standardized, explicit instructions with specific time periods each day such as
  - Morning
  - Noon
  - Evening
  - Bedtime

# Explicit Instructions (cont'd)

- Use numerals not alphabetic characters for numbers
  - Example: “Take 1 tablet in the morning and 1 tablet in the evening.”
- Dosing by precise hours of the day makes it harder for a patient to follow
- For oral liquids, provide measuring device that has volume markings corresponding with dosing instructions, preferably metric (mL)

# Optimize Typography

- High-contrast print (e.g., black print on white background)
- Sentence case (i.e., punctuated like a sentence in English: initial capital letter followed by lower-case words except proper nouns with capital first letter)
- Large font size (e.g., minimum 12-point Times New Roman or 11-point Arial) for critical information

# Optimize Typography (cont'd)

- Adequate white space between lines of text (25%–30% of the point size)
- White space to distinguish sections on the label such as directions for use vs. pharmacy information
- Horizontal text only



# Address Limited English Proficiency

High-quality translation process:

- Translation by a trained translator who is a native speaker of the target language
- Review of the translation by a second trained translator and reconciliation of any differences
- Review of the translation by a pharmacist who is a native speaker of the target language and reconciliation of any differences
- Testing of comprehension with target audience
- Standardized translated instructions:
  - To ensure the accuracy and safety of prescription container labeling for patients with limited English proficiency

# Purpose for Use

- If the purpose of the medication is indicated on the prescription, it should be included on the prescription container label
- Confidentiality and patient preference may limit inclusion of the purpose on labels
  - Practitioners should always ask patients their preference
- Use language that is clear and simple
- Use purpose-for-use language in clear, simple terms:
  - e.g., “for high blood pressure” rather than “for hypertension”
- <http://healthliteracy.com/dictionary.asp>

# Limit Auxiliary Information

- Auxiliary information on the prescription container label should be:
- Evidence-based:
  - Evidence-based auxiliary information, both text and icons, should be standardized
  - Should be applied consistently such that it does not depend on individual practitioner choice
- In simple explicit language:
  - Be minimized to avoid distracting patients with nonessential information
  - Most patients (especially the ones with limited literacy), pay little attention to auxiliary information



# 2016 Revisions to USP General Chapter <17>

- June 2014 US Access Board best practices for making prescription container label information accessible to visually impaired patients are addressed in 2016 revision
- Standardized patient-centered instructions such as the universal medication schedule (UMS) is addressed in 2016 revision
- Provision of standardized measuring devices for oral liquids corresponding with dosing instructions, preferably in metric (mL)

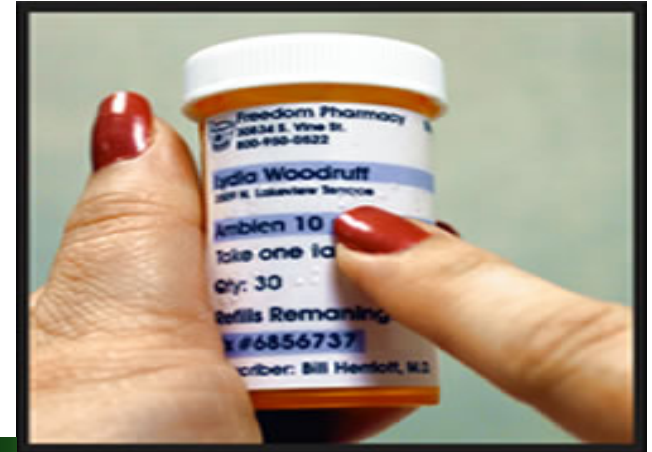
# Visual Impairment

- Follow patient-centered prescription container label standards
- Provide alternative access to label information such as tactile (braille), audible, or enhanced visual systems
- Enhance communications on available options
- Provide service or direct patient to alternative access
- Follow best practices for alternative access format
- Best practices recommended by the United States Access Board

# Examples of Alternative Access



Enlarged Print

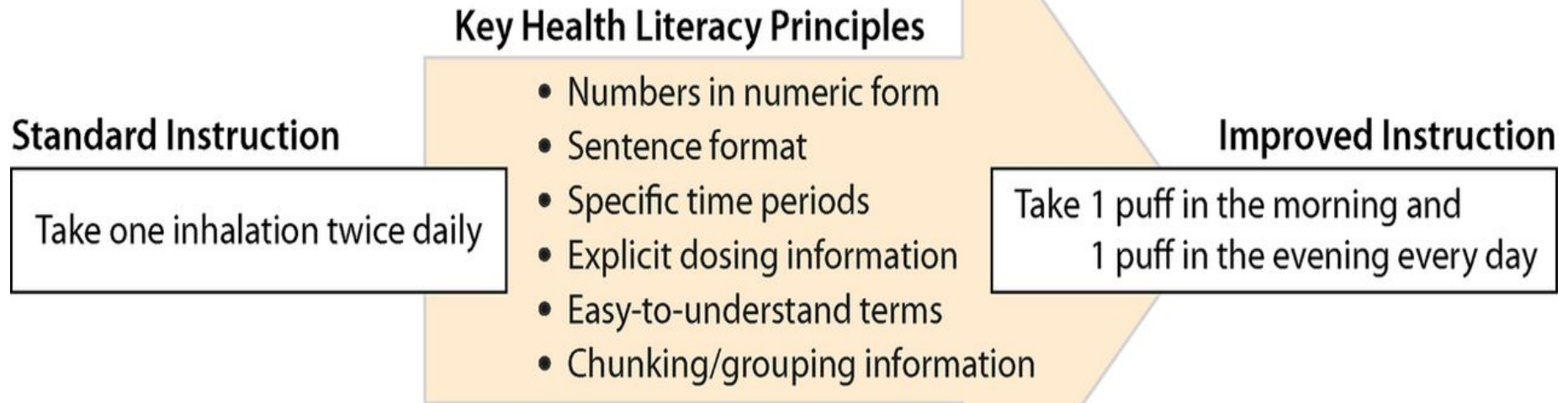


Braille



“Smart Label”

# Applying health literacy practices to prescription medication labeling using principles of UMS

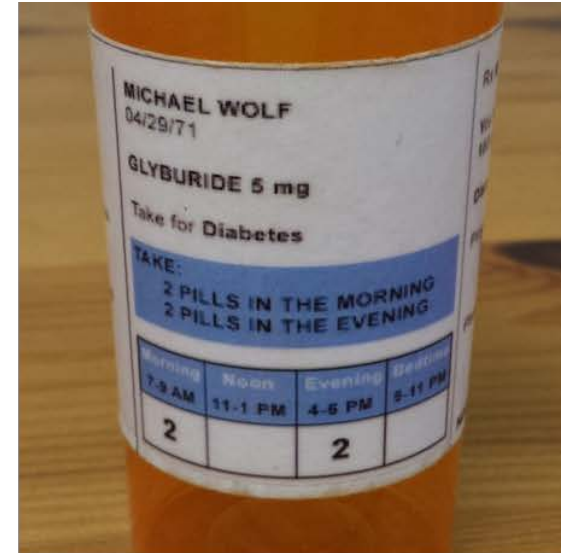


Stacy Cooper Bailey et al. *BMJ Open* 2014;4:e003699



# Patient-Centered Label Can Improve Understanding/Adherence

<p><b>Michael Wolf</b>    04/29/71</p> <p><b>Glyburide 5 mg</b></p> <p>Take for <u>Diabetes</u></p> <p><b>Take    2 pills at breakfast</b></p> <p><b>          2 pills at dinner</b></p>		<p>Rx#: 1234567    10/30/2008</p> <p>You have 11 refills 180 pills</p> <p>Discard after 10/30/2009</p> <p>Provider: Ruth Parker, MD Emory Medical Center (414) 123-4567</p> <p>Pharmacy: NoVA ScriptsCentral 11445 Sunset Blvd. Reston, VA (713) 123-4567</p> <p>NDC # 1234567</p>	<p><b>Important</b></p> <p>Do not drink alcohol.</p> <p>Limit your time in the sun.</p>								
<table border="1"> <thead> <tr> <th>Breakfast</th> <th>Lunch</th> <th>Dinner</th> <th>Bedtime</th> </tr> </thead> <tbody> <tr> <td>2</td> <td></td> <td>2</td> <td></td> </tr> </tbody> </table>	Breakfast	Lunch	Dinner	Bedtime	2		2				
Breakfast	Lunch	Dinner	Bedtime								
2		2									



RCT in 11 FQHCs.  
429 pts w DM and/or HTN.  
Average 5 meds  
Mean age 52, 28% W,  
39% low literacy

	Standard Label	PC Label
<b>Understanding</b>	<b>59%</b>	<b>74%</b>
<b>Adherence</b> (3 months)	<b>30%</b>	<b>49%</b>

**State Board of Pharmacy in CA passed  
legislation for this label**





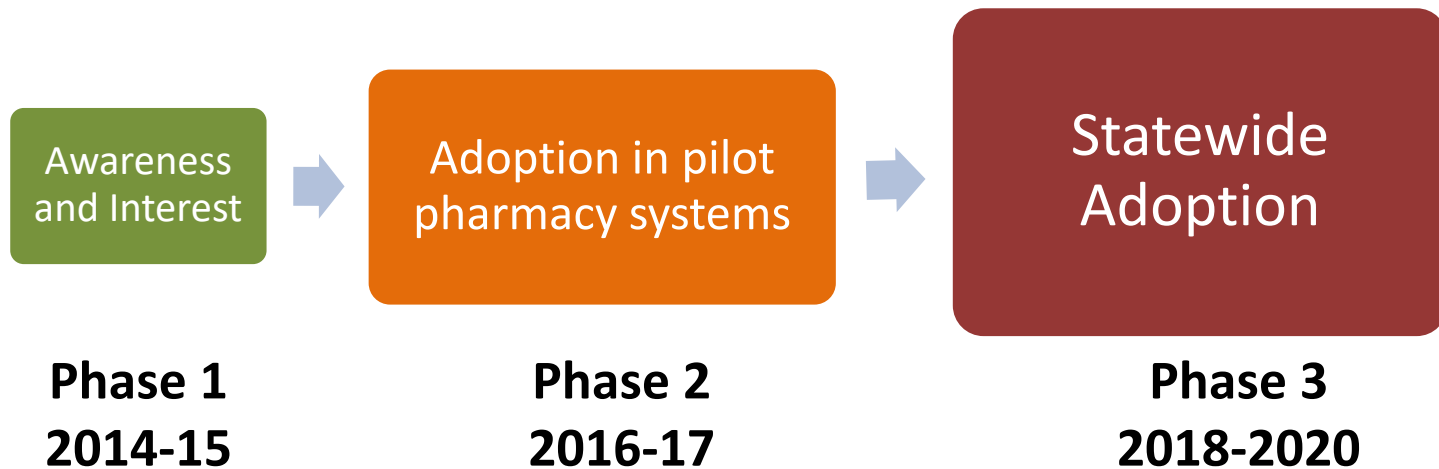
*Putting USP standards into practice*

# Adopting Patient-Centered Prescription Medication Labels

Program funded by



# 3-Phase Project



# Phase 1: Barriers and Facilitators

January 2014 – December 2015



[bit.ly/MedLabel](http://bit.ly/MedLabel)

Table 1: Key Stakeholders Interviewed

Category	Number of Respondents
Chain Pharmacists	2
Pharmacists at Independent Pharmacies	3
Chain Pharmacy Managers	4
Independent Pharmacy Managers	3
Physicians	3
Software Vendors	2

# **Phase 2: Implementing new labels in pilot pharmacies**

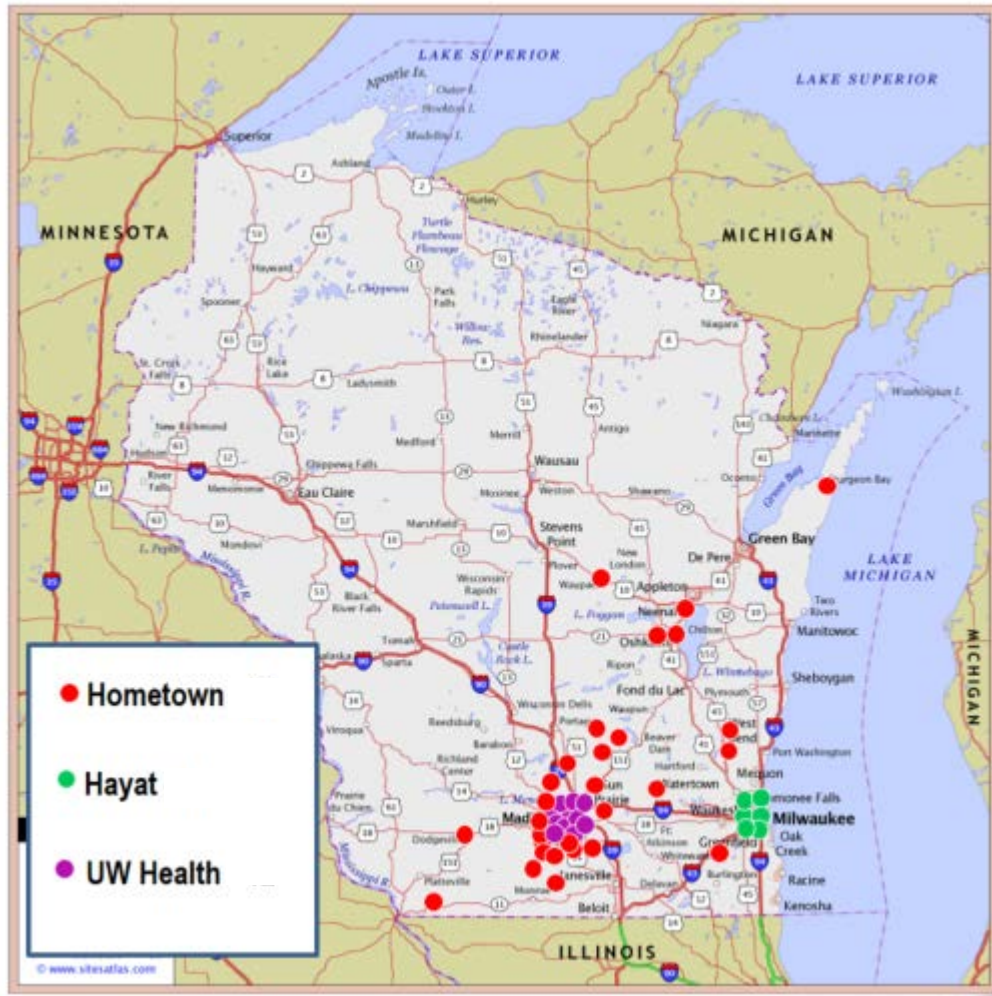
**January 2016 – December 2017**

# The proof: patient-centered labels are effective

- Improved comprehension and functional health literacy in older adults (Tai et al 2016)
- Better preference and comprehension among veterans (Trettin, V.A. 2011)
- Improved regimens and adherence mostly among those with limited literacy and more complex regimens (Wolf et al 2016)

# Participating Pharmacies

65  
pharmacy  
sites

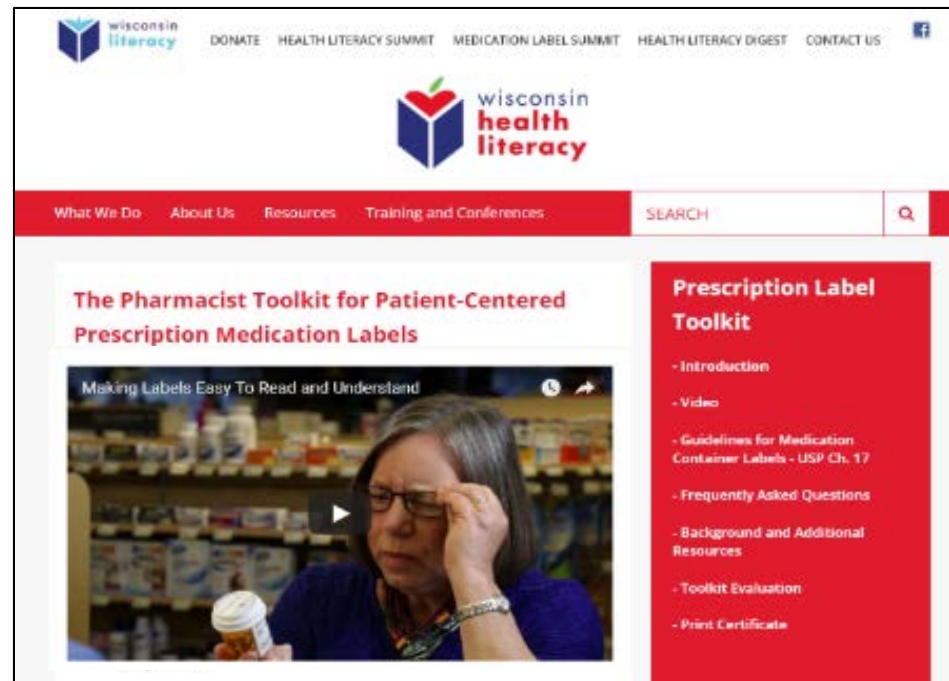


- Pharmacies:
- Hometown
  - Hayat
  - UW Health
  - Forward
  - Fitchburg Family

# The process of implementing new labels

1. Voluntary participation
2. New label design with vendor
3. Pharmacist training

[bit.ly/PharmacistToolkit](https://bit.ly/PharmacistToolkit)



The screenshot displays the Wisconsin Health Literacy website. The header includes the Wisconsin Literacy logo, navigation links for 'DONATE', 'HEALTH LITERACY SUMMIT', 'MEDICATION LABEL SUMMIT', 'HEALTH LITERACY DIGEST', and 'CONTACT US', and a Facebook icon. The main navigation bar features 'What We Do', 'About Us', 'Resources', and 'Training and Conferences', along with a search bar. The main content area is titled 'The Pharmacist Toolkit for Patient-Centered Prescription Medication Labels' and features a video thumbnail with the text 'Making Labels Easy To Read and Understand'. A red sidebar on the right lists the toolkit's components: Introduction, Video, Guidelines for Medication Container Labels - USP Ch. 17, Frequently Asked Questions, Background and Additional Resources, Toolkit Evaluation, and Print Certificate.



# Supporting activities

- Medication Label Summit



**82%** of attendees said they would advocate for improving labels

[bit.ly/LabelSummitVideos](https://bit.ly/LabelSummitVideos)

# Supporting activities

- Stakeholder communications
  - Pharmacy Examining Board
  - Chain pharmacies
  - Health organizations

November 2017



wisconsin  
health  
literacy

**Making Prescription Medication Labels  
Easier to Understand**

**Medication Label project set to expand number  
of participating pharmacies**

Wisconsin Health Literacy's (WHL) initiative to help make prescription labels easier to read will soon benefit hundreds of thousands more Wisconsin residents. The three-year project



# Old & new labels

**Hometown Pharmacy**  
429 West Cottage Grove Road  
Cottage Grove, WI 53527 608-839-3335

Rx 336830 N Dr MABIE, MATTHEW  
MICKEY MOUSE 04/20/16  
Take 1 tablet by mouth once daily for blood pressure

**ATENOLOL 100 MG TABLET** SANDOZ  
Qty: 30 NDC: 0781-1507-01 white / round  
Use By: 04/20/17 RPh: MM GG 264 / 264  
2 Refill(s) Until 04/20/17 Qty Left: 60

CAUTION: Federal law prohibits transfer of this drug to any person other than the patient for whom prescribed.

THIS DRUG MAY IMPAIR YOUR ABILITY TO DRIVE OR OPERATE MACHINERY. USE CARE UNTIL YOU BECOME FAMILIAR WITH ITS EFFECTS.

**Call your doctor for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.**

**MAY CAUSE DIZZINESS**

**IMPORTANT: USE EXACTLY AS DIRECTED. DO NOT SKIP DOSES OR DISCONTINUE UNLESS DIRECTED BY YOUR DOCTOR.**



**Fitchburg Family Pharmacy**



**ROBERT JOHNSON** 05/16/16

Take 1 tablet by mouth in the morning and take 1 tablet in the evening.

**ATORVASTATIN 20 MG TABLET**

Take with **FOOD** May cause **DIZZINESS**  
Do not **CRUSH** Do not **DRIVE**

**RX 1234567-12**

**Hometown Pharmacy** Refills: 3  
202 South Main Street Verona, WI 53593  
**(608) 848-8020** Dr. Lou Fallagant  
Use by: 05/16/17

Sandoz NDC: 12345-1234-12

# Evaluating Results

- **Patient surveys** (N=505)
  - 93%: important labels be easier to understand
  - 83% like new label better or same
  - Most like:
    - Easy to understand
    - Size of letters
    - Important information easy to find



# Evaluating Results

- **Pharmacist surveys** (N=94)
  - 84% aware of change
  - Impact for patients:
    - Better adherence
    - Fewer medication errors
    - More likely to benefit from meds

HEALTH | EASING MEDICATION CONFUSION TUESDAY, DECEMBER 12, 2017 WISCONSIN STATE JOURNAL



AMBER ARNOLD PHOTOS, STATE JOURNAL

Ryan Bender, a pharmacist at Hometown Pharmacy in Rio, said new prescription drug labels the pharmacy started using in June are simpler for patients to understand. The labels could help patients reduce medication errors, Bender said.

## Labels fight prescription errors

DAVID WAHLBERG  
dwahlberg@madison.com

After a doctor prescribed a pain patch for a woman with arthritis, the patient started slurring her words. She put patches on herself everywhere she hurt, her family discovered, not just in one place.

For a patient with epilepsy, a doctor changed a prescription from one, 1,000-milligram tablet twice a day to two 500-milligram tablets twice a day.

The patient kept taking one tablet twice a day, and subsequently had a seizure.

Drug labels can be confusing, especially for people who are elderly or not fully literate. Wisconsin Health Literacy is working with pharmacies to introduce new

labels based on national guidelines that emphasize key information, clear instructions and readability.

"Our goal is to improve the labels so they're easier to understand and people are able to more effectively use their medications," said Steve Sparks, director of Wisconsin Health Literacy, part of Madison-based Wisconsin Literacy.

In a survey by the nonprofit this year of more than 700 patients, 88 percent said they have found drug labels difficult to understand. Nearly 23 percent said they have taken prescriptions incorrectly because of confusing labels.

Some of the patients joined



Rio Hometown Pharmacy's new prescription drug label, left, stresses the patient's name, drug name and instructions on taking the drug. The old label, at right, put the pharmacy name and address on top, with the prescription number and doctor name farther down.

Please see LABELS, Page A30

# Learnings for future success

- Pharmacists - focus on patients
- Customization is key
- Software vendors are critical partners
- Stories help motivate change
- Change needs tie to adherence

# What's Next

Phase 3: 2018-2020



# Phase 3: Statewide Adoption

1. Label change expansion statewide
2. Sig improvement
3. Resources for continued adoption
4. Further label evaluation



# Phase 3: Statewide Adoption

## 1. Label Change Expansion Statewide:

- Non-phase 2 pharmacies and systems
  - 15-21% of pharmacies in WI
- Emphasize counties with greatest health needs
- Consultation for label changes

# Phase 3: Statewide Adoption

## 2. Sig Improvement:

- Taskforce of stakeholders  
EHR vendor, health systems,  
pharmacy staff
- Listening sessions – reduce  
variability in phrasing of sigs
- Pilot test in health system



# Phase 3: Statewide Adoption

## 3. Resources for Continued Adoption:

- Implementation Guide
- Web Resources for Pharmacists and Health Systems
- Access to Label Change “Champions”

# Phase 3: Statewide Adoption

## 4. Further Label Evaluation:

- Partner with WI QIO – Medicare utilization data (Hosp, ER, Clinic, RX)
- All Phase 2 pharmacies
- Phase 3 pharmacies