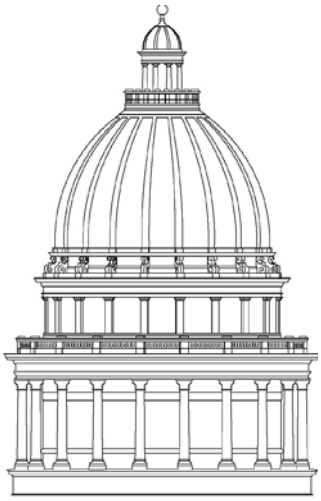
REPORT TO THE

UTAH LEGISLATURE

Number 2015-08



A Performance Audit of the Utah Poison Control Center

July 2015

Office of the
LEGISLATIVE AUDITOR GENERAL
State of Utah

STATE OF UTAH

Office of the Legislative Auditor General

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JOHN M. SCHAFF, CIA
AUDITOR GENERAL

July 14, 2015

TO: THE UTAH STATE LEGISLATURE

Transmitted herewith is our report, **A Performance Audit of the Utah Poison Control Center** (Report #2015-08). A digest is found on the blue pages located at the front of the report. The objectives and scope of the audit are explained in the Introduction.

We will be happy to meet with appropriate legislative committees, individual legislators, and other state officials to discuss any item contained in the report in order to facilitate the implementation of the recommendations.

Sincerely,

John M. Schaff

John M. Schaff, CIA
Auditor General

JMS/lm

Digest of
A Performance Audit of the
Utah Poison Control Center

Chapter I
Introduction

The Utah Poison Control Center (UPCC) is the poison information authority for the state of Utah. The UPCC is a 24-hour resource for poison information, clinical toxicology consultation, and poison prevention education. The role of the poison center is to rapidly assess each exposure and make recommendations for treatment. The poison center employs nurses and pharmacists trained as specialists in poison information (SPIs) to take calls.

Chapter II
Legislature Should Consider
Formally Defining UPCC's Mission

Current Relationship with the University Not Defined In Statute. The UPCC has been associated with the University of Utah since 1954, but has not been legislatively defined. Initially, the Department of Health (DOH) provided funding; in 1998, the Legislature provided funding by allocating funds from a telephone surcharge. In 2014, the Legislature changed UPCC's funding source to a General Fund appropriation. The UPCC sees its relationship with the university as a mutually beneficial, long-term relationship that has been in force since UPCC's inception. The UPCC has been receiving services and some financial resources from the university. Currently, there are other entities supported by legislative funding that are required to be housed at the university and defined in ***Utah Code***. We believe the Legislature should provide this same statutory guidance to UPCC.

$2.5 Million Transfer Lacked Documentation and UPCC May Not Receive Full Value of Transfer. The transfer of $2.5 million to the university from 2008 through 2010 for housing UPCC was not documented in a written contract, thus putting UPCC in a vulnerable situation should the university dissociate itself from the UPCC. The $2.5 million paid by UPCC to be housed at the university allows the UPCC to receive free rent for an undetermined amount of time, and may prove to be more costly to UPCC. The interest on the $2.5 million payment to the university would cover the rent indefinitely. We recommend the UPCC and the university develop a contract that outlines the subletting of space to the UPCC at the university at no charge.

Most Poison Control Centers Are Defined in Statute or Housed in Universities. We found other poison centers throughout the United States that are legislatively defined as well as housed in universities. We contacted 17 poison centers and found that 11 of the 14

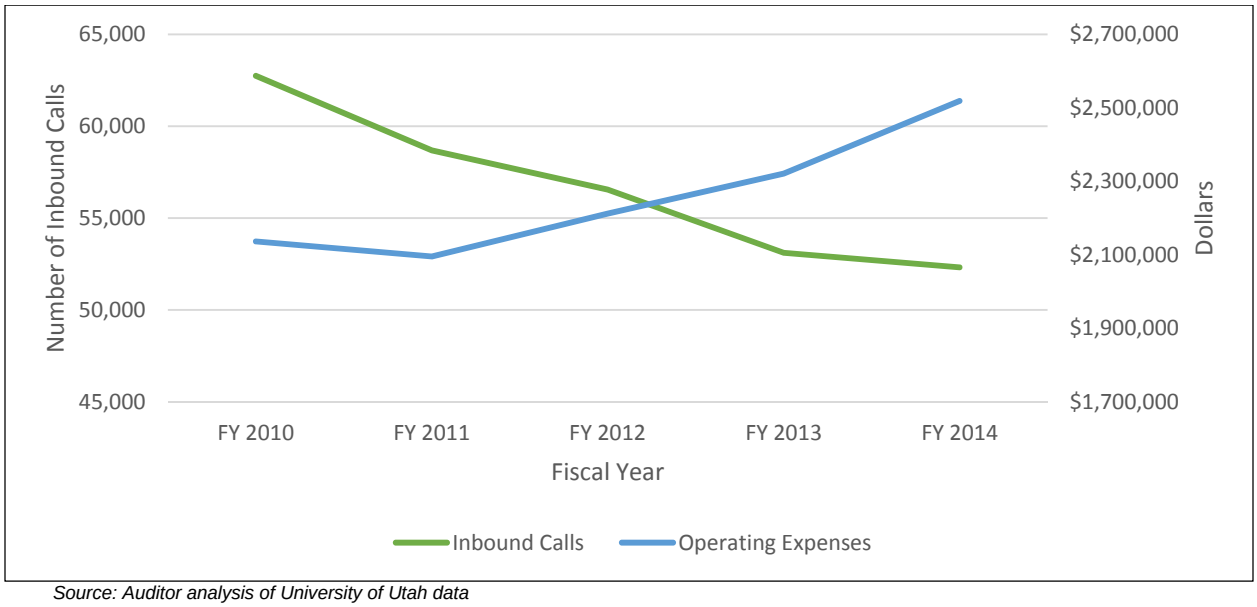
that responded are codified in their respective state statutes. We also found that 6 of the 11 responding poison control centers are housed at universities. In addition, five of those six poison control centers conduct research.

Chapter III
UPCC Can Improve Its Delivery of Services

In light of increased expenditures and decreased call volume, we were asked to assess the operational efficiency of the UPCC and determine if improvements are needed. We found the cost for inbound calls to UPCC has increased over a five-year period. UPCC contends this increase is partially attributable to the increased acuity (complexity) of inbound calls as reflected in increased call times, but does not have supporting evidence.

Inbound Calls Have Decreased While Costs Have Increased. Inbound calls received by UPCC decreased 17 percent from 2010 to 2014. UPCC operating expenses rose from $2.1 million in fiscal 2010 to $2.5 million in fiscal year 2014, an 18 percent increase. Decreasing inbound call volume, increasing time actually spent on inbound calls, and increasing compensation levels are contributing to increasing costs per inbound calls.

Inbound Calls and Operating Expenses from Fiscal Years 2010 through 2014.



Source: Auditor analysis of University of Utah data

UPCC Should Develop Metrics and Consider Modifying Its Staff Composition. We found that UPCC lacks metrics to adequately measure the cost efficiency and effectiveness of the specialists. We contacted 14 poison centers across the country and found they were either affiliated with a university or hospital or operated as an independent, non-profit organization. Poison centers affiliated with universities and their respective colleges of pharmacy primarily employ pharmacist specialists in poison information. Pharmacist specialists at UPCC are more cost efficient at answering inbound calls than nurse specialists.

We are therefore recommending UPCC continue to assess its operations by developing and tracking metrics that determine the effectiveness and efficiency of specialists. We also recommend that UPCC study and determine the appropriate combination of pharmacist and nurse specialists to maximize efficiency and effectiveness.

Poison Information Providers (PIPs) Could Be More Fully Utilized to Lower Operational Costs. PIPs could act as low-cost alternatives to specialists in answering lower-risk-exposure calls and informational calls (providing poison and drug information and identification). The use of PIPs could help UPCC with the recruiting and training of future specialists as well. We recommend that UPCC conduct further study into the use of PIPs as a means of increasing efficiency and reducing personnel costs.

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REPORT TO THE
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Report No. 2015-08

A Performance Audit of the Utah Poison Control Center

July 2015

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Chapter I
Introduction

The Utah Poison Control Center (UPCC) is the poison information authority for the state of Utah. The UPCC is a 24-hour resource for poison information, clinical toxicology consultation, and poison prevention education. The role of the poison center is to rapidly assess each exposure and make recommendations for treatment. The poison center employs nurses and pharmacists trained as poison specialists to take calls.

The current form of the UPCC has existed since 1971. The center is currently housed on the University of Utah campus in the Skaggs Pharmacy Building. The major goals of the UPCC are:

- To provide 24-hour emergency telephone service to the public and health professionals of Utah for assistance during a poisoning emergency

UPCC provides 24-hour emergency telephone service for poisoning emergencies.

- To be a state resource for accurate and up-to-date poison information and clinical toxicology consultation to the public, health-care professionals, emergency service personnel, public health officials, and media

- To provide quality poison prevention and awareness education throughout the state

- To be a leader in Utah for education of health professionals and health professional students in clinical toxicology

- To conduct clinical toxicology, poisoning epidemiology, and poison prevention research

- To be an integral part of disaster planning and response through actively participating in state, local, University of Utah Health Sciences Center, and national Disaster Preparedness and Response activities

- To maintain accreditation as a regional poison control center by the American Association of Poison Control Centers

The backbone of this operation lies with the pharmacists and nurses who take phone calls 24 hours a day, seven days a week. The origins of almost all work originates with inbound calls. Another duty is to make the public aware of the poison control center, through an outreach education program.

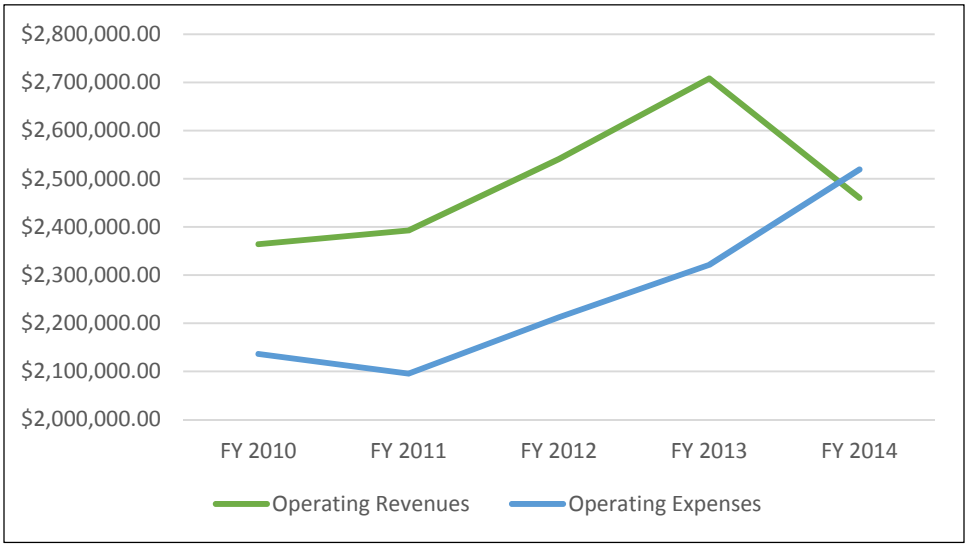
Outreach education should contribute to utilization of the poison control center and reduce the amount of emergency room use.

One of the desired outcomes of outreach education is to increase the utilization of poison control centers, which could potentially reduce the severity of poisonings and the amount of emergency room use. As part of accreditation, UPCC is required to provide this outreach education, though the amount of resources devoted to this responsibility is not stipulated in the accreditation standards.

UPCC Operating Expenses Increased From Fiscal Years 2010 Through 2014

The majority of UPCC's budgetary funds are devoted to phone-related work as well as functions supporting phone work. As shown in Figure 1.1, the UPCC's operating expenses and revenues increased during fiscal years 2010 to 2013.

Figure 1.1 Operating Revenues and Operating Expenses from Fiscal Year 2010 to Fiscal Year 2014.



Source: Auditor analysis of Utah Poison Control Center and University of Utah data

While operating expenses continued to increase through fiscal year 2014, revenues decreased, resulting in expenses in excess of revenues. Personnel expenses made up the majority of UPCC's operating expenses from fiscal years 2010 to 2014, while most of UPCC's operating revenues came from an emergency services telecommunications charge (see Figure 1.2).

In 2014, UPCC's expenses exceeded revenues.

UPCC experienced an 18 percent increase in its operating expenses from fiscal years 2010 to 2014. Figure 1.1 shows that operating expenses rose from $2.1 million in fiscal year 2010 to $2.5 million in fiscal year 2014. Figure 1.1 also shows that operating expenses actually exceeded operating revenues in fiscal year 2014 by roughly $59,000. Chapter III provides detailed discussion about the factors driving UPCC's increased operating expenses over the past five years.

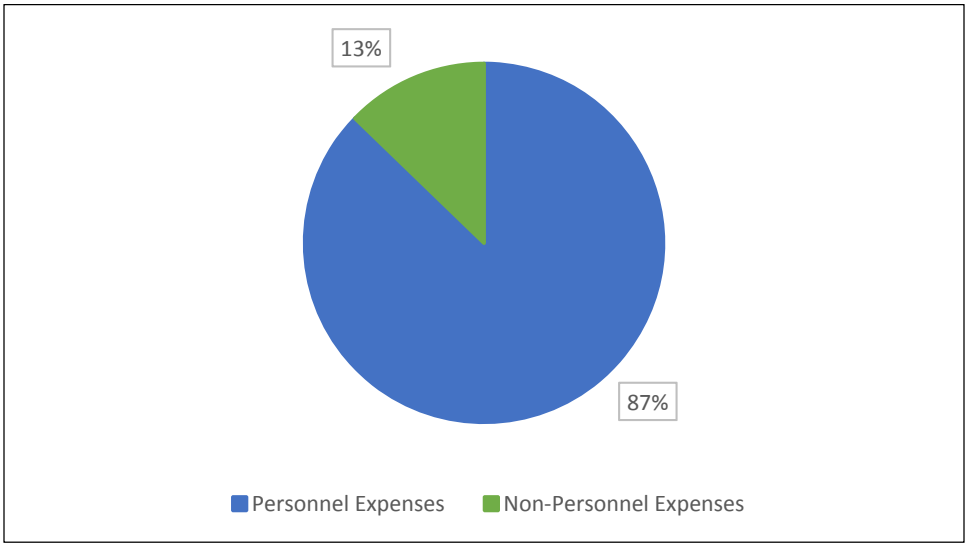
UPCC's operating revenues increased 15 percent from fiscal years 2010 to 2013, but decreased 9 percent from fiscal year 2013 to 2014. During fiscal years 2010 to 2014, UPCC received virtually all of its operating revenues from the emergency services telecommunications charge. Beginning in 1998, UPCC received seven cents per month on each local exchange service switched access line and each revenue-producing radio communications access line subject to the charge. UPCC also received a portion of the prepaid wireless telecommunication charge for its funding.

UPCC stopped receiving funding from the emergency services telecommunications charge in 2014, and now receives direct funding from the Legislature.

During the 2014 General Legislative Session, the Legislature passed House Bill 155, which redirected the emergency services telecommunications charge funds to a computer-aided emergency dispatch system. UPCC now receives its funding directly from the state's general fund.

UPCC's Personnel Expenses Are the Majority of Its Operating Expenses. Figure 1.2 shows that personnel expenses constituted roughly 87 percent of UPCC's total operating expenses from fiscal years 2010 to 2014, while non-personnel expenses made up 13 percent.

Figure 1.2 Personnel and Non-Personnel Expenses from Fiscal Years 2010 to 2014.



Source: Auditor analysis of Utah Poison Control Center and University of Utah data

Personnel expenses primarily consisted of employee wages and benefits. Non-personnel expenses encompassed expense items such as travel, equipment, telephone service, office supplies, printing, repairs and maintenance, and space rental.

Audit Scope and Objectives

We were asked to conduct a performance audit of the UPCC in response to a concern that it was requesting an increase in funding when the number of phone calls received has declined. We reviewed the following areas:

- Determine if the placement of UPCC within the University of Utah is appropriate.
- Determine if the UPCC is true to its overall mission.
- Determine whether the transfer of $2.5 million from UPCC to the University of Utah was appropriate.
- Determine whether there are efficiencies that need to take place to foster improvement for UPCC.

Chapter II
Legislature Should Consider Formally Defining UPCC's Mission

We were asked to determine whether the University of Utah is the best placement for the Utah Poison Control Center (UPCC), and whether the center is complying with the overall mission it developed. We were also asked to determine the impact of a $2.5 million transfer from UPCC to the university. We found there are certainly some advantages to the present association between the UPCC and the university. However, since the UPCC is not currently defined in ***Utah Code***, it is not clear if the center is fulfilling its mission as intended by the Legislature. While the $2.5 million transfer allows UPCC to be perpetually housed rent-free, there are no guarantees for a permanent arrangement because there is no contract. We found other states that have both statutorily defined their poison control centers and located them within their state universities.

Current Relationship with the University Not Defined In Statute

Since the UPCC and its mission are not included in ***Utah Code***, it is difficult to know if its placement within the University of Utah is appropriate. The UPCC has been within the university since 1971, and has thus grown to be a part of the university, which offers some clear advantages. However, the university is not legally required to house or provide any services to UPCC—a situation which puts the UPCC at the will of the university. Currently, there are other entities supported by legislative funding that are required to be housed at the university and are also defined in ***Utah Code***. We believe the Legislature should provide this same statutory guidance to UPCC.

The UPCC has been within the University of Utah since 1971, however, the university is not required to provide accommodations or services.

The current mission developed by the UPCC "…is to prevent and minimize adverse health effects from a poison exposure through education, service, and research." As part of its accreditation with the American Association of Poison Control Centers (AAPCC), UPCC is required to provide the service and education aspects of its mission. However, the research component is an expectation placed on UPCC as a result of being affiliated with the University of Utah; later in this

report, we will discuss similar poison control centers that are housed at other states' universities. If the Legislature desires to maintain this current research arrangement, it should consider specifying that research is a legitimate part of UPCC's mission.

UPCC Evolved Without Legislative Guidance

The UPCC has been associated with the University of Utah in one form or another since 1954, but has not ever been legislatively defined. The UPCC has moved several times during its history and has only recently found permanency on the university's campus. Since the UPCC has been connected with the university, the center has been located within or in close proximity to it.

The UPCC started out as a service to physicians in 1954, and was located at the Salt Lake General Hospital. In 1971, the poison control center expanded to a regional center, called the Intermountain Regional Poison Control Center (IRPCC). The IRPCC changed its focus from services only for physicians to a service that anyone from the public could access, but this change was not a result of any legislative action.

In 1971, poison control center was relocated to a room adjacent to the emergency department at the University Hospital. At that point, the IRPCC became a training ground for pharmacy students, which commenced the current poison control center's association with the College of Pharmacy. The IRPCC changed its name to the Utah Poison Control Center in 1992. The UPCC remained housed at the University Hospital until 1993, when it moved to the university's Research Park. It remained there until its most recent move to the Skaggs Pharmacy Building in 2013.

The UPCC received funding from the Department of Health until 1998, when the legislature provided funding through a telephone surcharge.

Funding for the UPCC has also changed over time. Initially, the Department of Health (DOH) provided funding; however, in 1998, UPCC dropped DOH funding after the Legislature provided funding by allocating funding from a telephone surcharge to the UPCC, as defined in ***Utah Code*** 69-2-5.5. Though the statute stipulated the amount UPCC would receive, it did not define UPCC legislatively.

Funding changed again during the 2014 General Session, when the Legislature changed UPCC's funding source to a General Fund appropriation. According to the Office of the Legislative Fiscal Analyst, the Legislature wanted to use the telephone surcharge for a different purpose. The Legislature did not formally define UPCC's role during this time. The UPCC has had legislatively authorized funding during its existence but has not received formal legislative guidance.

The UPCC stopped receiving the telephone surcharge in 2014 for a General Fund appropriation.

UPCC Behaving as a University Unit Appears Mutually Beneficial

The UPCC sees its relationship with the university as a long-term relationship that has been in force since UPCC's inception. As mentioned, the UPCC receives state General Funds, which are disbursed to the University of Utah, then transferred to the UPCC. The university has primarily provided nonfinancial support to UPCC for over 40 years, which implies a relationship between the university and UPCC. As a result, UPCC believes they are part of the university and its transfer of the $2.5 million was a perception of that relationship and a gesture of the association between them (Note: the $2.5 million transfer is discussed later in the chapter).

The University of Utah has provided the UPCC with nonfinancial support for over 40 years.

In addition, the Utah Poison Control Center has been receiving services, and some financial resources, from the University of Utah. As a result, UPCC staff believes it is part of the university. Figure 2.1 shows what the university provides to the UPCC.

Figure 2.1 The University of Utah Provides Services to UPCC.

1. Pooled Administrative Services
- Payroll
- Human Resources
- IT Services
- Office Space
- Liability Insurance

2. A Portion (25%) of UPCC's Director's Salary Paid by the University
- Director required to teach courses
- Director required to perform research as a faculty member

3. Access to Pharmacy Students for UPCC Employment and Internships

These services shown in Figure 2.1 are not insignificant. For example, having the ability to receive pooled administrative services likely gives UPCC savings from economies of scale that would not be possible as a stand-alone agency. The university also benefits from research that UPCC performs in association with the pharmacy school. The mutual services provide evidence of a tacit relationship between the UPCC and the university.

As a nationally accredited program, the UPCC must provide service and educational resources to the public.

The UPCC is a nationally accredited poison center (through the AAPCC) that is required to provide service and educational resources to the public, but the research component is not required by the AAPCC. The type of research conducted is clinical toxicology, poisoning epidemiology, and poison prevention research. There is an expectation for the director of the UPCC to do research.

The director of the UPCC is also a faculty member of the university. As a faculty member, there is an expectation that the director meet objectives that are research-oriented, such as publishing at least two journal articles each year. This expectation has been set forth by the director's department chair. Therefore, the UPCC does fulfill research-related functions to meet its research mandate.

Past University Leadership Communicated Support for UPCC. We found a letter addressed to the Legislative Fiscal Analyst in November 1997 that clearly states the relationship between UPCC and the university from the university's perspective:

> …The University of Utah has agreed to have the Poison Control center come under its auspices…The agreement to house the Poison Control center at the University came with the understanding that the Poison Control center would be fully funded from resources outside of the University….

The University of Utah believes that the UPCC is part of the university.

The letter shows that the university also believes that the UPCC is part of it. Since this relationship appears to exist, UPCC has also formulated its mission to not only meet poison control needs, but to meet research needs of the university. To restate: the UPCC's mission is "…to prevent and minimize adverse health effects from poison exposure through education, service, and **research.**" (emphasis added)

University of Utah Not Legally Required to Provide Assistance to UPCC

UPCC has neither been written into ***Utah Code*** nor is there any definitive documentation that they are a part of the University of Utah, despite the 1997 letter to the Legislative Fiscal Analyst. Therefore, we spoke to the Office of Legislative Research and General Counsel (OLRGC) to determine whether the current affiliation UPCC has with the university is legally binding. According to OLRGC, the university is not legally obligated to provide any assistance to the UPCC.

The UPCC has not been written in Utah Code.

As discussed earlier in the chapter, there are services provided by the university that gives the appearance of a relationship between UPCC and the university. Placing UPCC within the university would be similar to other programs defined in state statute.

Other Programs Housed at the University of Utah Are Defined in Statute

Even though UPCC is currently housed within the University of Utah, there is nothing preventing the university from displacing UPCC. Contrastingly, there are entities within the university that are funded by the Legislature and required in state statute to be contained within the university. These programs are defined in ***Utah Code,*** 53B-17. The following are programs codified to be housed at the university:

- State Museum of Natural History
- Utah Museum of Fine Arts
- Rocky Mountain Center for Occupational and Environmental Health

The State Museum of Natural History, The Utah Museum of Fine Arts and the Rocky Mountain Center for Occupational and Environmental Health are housed at the university and are defined in state statute.

In addition to statute stating the university's responsibility to house them, each program's purpose is stated in statute. We recommend that the Legislature similarly define the mission and placement of the Utah Poison Control Center in statute to provide guidance and stability to the program.

$2.5 Million Transfer Lacked Documentation And UPCC May Not Receive Full Value of Transfer

UPCC transferred $2.5 million, from 2008 through 2010, to the University of Utah with the understanding that it would have long-term accommodations at the Skaggs Pharmacy Building. According to the director of UPCC, the $2.5 million was applied to the pharmacy building's construction cost. However, we found neither a contract nor even a memorandum of understanding between UPCC and the university. Further, we found no documentation authorizing this transfer. In fact, UPCC was told by a member of the university that the funds transfer was not necessary. The university is not contractually obligated to provide housing to UPCC. Even though the $2.5 million is used for residence at the university for the foreseeable future, the funds may be recoverable if the current relationship with the university were to be terminated. The best option to avoid the possibility of termination is for UPCC and the university to formalize a contract.

UPCC transferred $2.5 million to the University for long term accommodations but neither a contract nor memorandum of understanding (MOU) was entered into.

Contract for $2.5 Million Between UPCC and University Necessary to Protect UPCC

The relationship between UPCC and the University of Utah is not defined in statute, which puts UPCC in an unstable position with the university. Specifically, the transfer of $2.5 million for housing was not documented in a written contract, thus putting UPCC in a vulnerable situation should the university dissociate themselves from the UPCC. However, according to the Office of Legislative Research and General Counsel (OLRGC), UPCC may be able to recoup the $2.5 million if the affiliation with the university ever ended (See legal opinion Appendix A).

During the construction of the Skaggs Pharmacy Building, the UPCC sent partial payments to the university. The dean of the college of pharmacy at that time inquired if a memorandum of understanding (MOU) would be necessary; however, a university official stated that, since they were transferring funds to a plant account, an MOU would not be necessary. Consequently, an MOU or contract was not entered into.

A university official stated that an MOU was not necessary for the transfer of $2.5 million.

When we asked for documentation allowing UPCC to stay indefinitely, the university provided UPCC with an agreement, after the audit had started, which states the following:

> The University of Utah, College of Pharmacy agrees to allow the use of [space]…of the L.S. Skaggs Jr. Research Building…at no cost to the Utah Poison Control Center (UPCC).
>
> This agreement shall remain in place until such time that the Utah Poison Control Center becomes dissociated with the University of Utah or the center is no longer in operation.
>
> This agreement covers only the space itself…

This agreement does not assure long-term housing for UPCC, but simply states that UPCC can be housed at the Skaggs Research Building until they "become dissociated" with the university. We recommend that the UPCC draw up a formal contract with the university to provide long-term housing.

After the audit commenced, the university provided the UPCC with an agreement that does not assure long-term housing for the UPCC.

UPCC May Not Receive Full Value of Transfer of $2.5 Million

The $2.5 million paid by UPCC to be housed at the university is simply to allow the UPCC to receive free rent for an undetermined amount of time, and may prove to be more costly to UPCC. As mentioned earlier, this arrangement puts UPCC at a disadvantage since the center could potentially lose $2.5 million and not have a place to be housed, should the relationship between the UPCC and the university end.

The $2.5 million transfer allows the UPCC not to pay rent or a grounds fee for an indeterminate amount of time.

The UPCC still pays all costs, with the exception of rent and a grounds fee that were paid prior to locating in the Skaggs Research Building at the university. The current location provides better security for UPCC than the prior site and is closer to the university than the previous location. In addition, the UPCC receives the benefit of pooled administrative services mentioned earlier. While difficult to quantify these benefits, we can estimate what the UPCC's payment of $2.5 million equates to in terms of rent.

Before UPCC moved to the university, the center annually paid an average of $65,000 rent and fees. Hypothetically, UPCC's $2.5 million payment to the University of Utah would cover a long-term

The $2.5 million payment to the university would cover a long-term lease of 30 years, which would still be $16,000 higher than what they were paying for both rent and grounds fees prior to the transfer.

lease of 30 years at an annual rent of approximately $81,000. This amount would still be $16,000 higher than UPCC paid before it moved. If the UPCC simply received interest at 3 percent, that amount would sufficiently cover the rent by $10,000 for an indefinite period of time.

To protect UPCC from being charged rent in the future, a contract must be entered into, which would also prevent a possible eviction without cause.

Most Poison Control Centers Are Defined in Statute or Housed in Universities

Of the seventeen poison control centers contacted, eleven are codified in their respective state statute.

We found other poison centers throughout the United States that are legislatively defined and are also housed in universities. We contacted 17 poison centers and found that 11 of the 14 that responded (80 percent) are codified in their respective state statutes. We also found that 6 of the 11 responding poison control centers (55 percent) are housed within universities. We believe this data can aid the Legislature in defining the mission and placement of the UPCC and ensuring that it functions according to legislative intent. Figure 2.2 shows which respondents are defined in statute and which are located at a university.

Figure 2.2 Majority of Poison Control Centers Are Defined in Statute; Some Are Also Housed in a University.

Poison Control Center	Defined in Statute	Housed in a University
Arizona Poison & Drug Information Center	✓	✓
Banner Good Samaritan Poison & Drug Information Center (Arizona)	✓	
California Poison Control System—San Francisco Division	✓	✓
Florida Poison Information Center—Jacksonville	✓	✓
Iowa Poison Control Center	✓	
Kansas Poison Control Center		
Michigan Poison Control Center	✓	
Missouri Poison Center	✓	
Nebraska Regional Poison Center		
New Mexico Poison and Drug Information Center	✓	✓
Oklahoma Center for Poison and Drug Information	✓	✓
Oregon Poison Center	✓	✓
Rocky Mountain Poison & Drug Center		
Washington Poison Center	✓	

One key issue that we were asked to look at was whether research should be a part of UPCC's mission. Of the six poison control centers housed in universities, five conduct research.

Six poison control centers are housed in universities, five of these are required to perform research.

The Arizona Poison and Drug Information, as a specific example, has its mission and placement within the University of Arizona defined within its state statute:

> … This center shall be located at and affiliated with the university of Arizona college of pharmacy… shall be affiliated with the toxicology training programs of the Arizona health sciences center.…[S]hall be privately operated and shall be affiliated with an accredited

> medical toxicology fellowship postgraduate training program for physicians...The Arizona poison control system shall provide comprehensive poison and drug information and management of poisoned persons…poison control center shall employ a full-time staff, including a clinical or medical toxicologist and poison and drug information specialists and treatment consultants…poison control center shall assume responsibility for the following functions in its respective region: 1. Poison prevention, 2. Data collection, 3. Education, 4. Management of poisoned persons, 5. Drug information services.

The expectation to perform research is not written in statute; however, according to an official with the Arizona Poison and Drug Information center, they are expected to perform research. We believe the UPCC can benefit through similar codification. Therefore, in order to ensure legislative input on the UPCC's mission and location, the Legislature should define the UPCC in ***Utah Code***.

Recommendations

1. We recommend the Legislature consider statutorily defining the mission of the Utah Poison Control Center and its function within the state of Utah.

2. We recommend the Legislature consider defining the Utah Poison Control Center's relationship with the University of Utah.

3. We recommend that the Utah Poison Control Center and the University of Utah develop a contract that outlines the subletting of space to the Utah Poison Control Center at the University of Utah at no charge.

Chapter III
UPCC Can Improve Its Delivery of Services

In light of increased expenditures and decreased call volume, we were asked to assess the operational efficiency of the Utah Poison Control Center (UPCC) and determine if improvements are needed. We found the cost for inbound calls to UPCC has increased over a five-year period. UPCC contends this increase is partially attributable to the increased acuity (complexity) of inbound calls, as reflected in increased call times, but does not have supporting evidence. In the absence of established measures, we suggest UPCC implement metrics measuring the cost efficiency of specialists in poison information (SPIs). We also suggest modifications to UPCC's staffing structure to help increase cost efficiency. Poison centers affiliated with colleges of pharmacy primarily employ SPIs with pharmacy backgrounds. We found UPCC's pharmacist SPIs are more cost efficient at answering calls than are their nurse counterparts. In addition, multiple nurse SPIs currently receive salaries in excess of the pay grade maximum. Finally, poison information providers (PIPs) could help UPCC lower its operational costs by answering low-risk inbound calls.

Inbound Calls Have Decreased While Costs Have Increased

Over the past five years, the number of inbound calls[1] to UPCC steadily decreased, but UPCC operating expenses steadily increased. Call rates are also declining nationally, but the exact cause for declining rates is unknown. UPCC administration believes an increased complexity of calls is contributing to Utah's declining rates. As for operating expenses, increasing personnel costs, specifically higher salaries, are contributing to UPCC's operating expense growth. Contracted medical director services are adding to the growth as well. As a result of decreasing inbound calls, increasing average time spent

Over the past five years, inbound calls have decreased and expenses have increased.

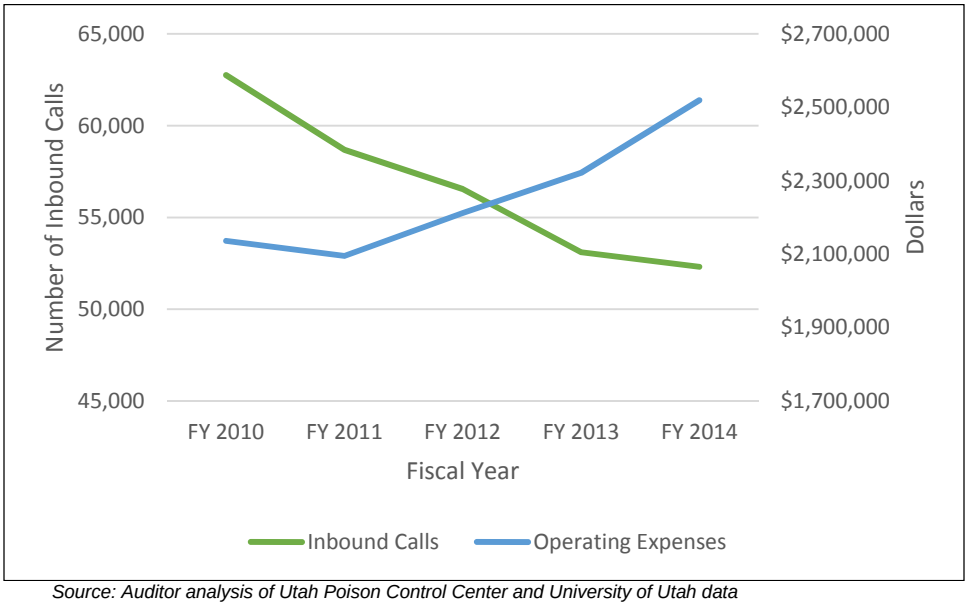
[1] Inbound calls referred to in this report represent Automated Call Distributor (ACD) calls answered by UPCC specialists in poison information (SPIs).

on inbound calls, and increasing average annual compensation for SPIs, the average cost for SPIs to answer an inbound call is increasing.

Inbound Call Volume Continues to Decrease While Operating Expenses Increase

Inbound calls received by UPCC decreased 17 percent over a five-year period. In fiscal year 2010, UPCC received approximately 63,000 inbound calls. This amount decreased to roughly 52,000 by fiscal year 2014, as shown in Figure 3.1.

Figure 3.1 Inbound Calls and Operating Expenses from Fiscal Years 2010 through 2014.



Source: Auditor analysis of Utah Poison Control Center and University of Utah data

Inbound calls can include poisoning exposures, drug information, and medical information as well as requests for educational materials and call backs with additional questions.

Inbound calls encompass a wide variety of situations. For instance, UPCC receives calls for poisoning exposures, drug identification, poison and drug information, and medical information. Incoming calls also include individuals requesting educational materials, individuals calling UPCC back with additional questions, and individuals returning calls left by UPCC.

Poison control centers throughout the country are experiencing decreased inbound call volumes. Call data collected by the American Association of Poison Control Centers (AAPCC) demonstrates a national trend of declining human exposure, information, animal exposure, and drug identification calls to poison centers. Research indicates that declining call rates could be caused by declining birth rates, increased use of texting opposed to voice calls, and greater use of

the internet to find information. UPCC officials credited declining call rates at UPCC to individuals using the internet for poisoning questions. They also believe calls are becoming more complex and contributing to a decline in call rates. However, we were unable to validate the claims made by the literature and UPCC officials.

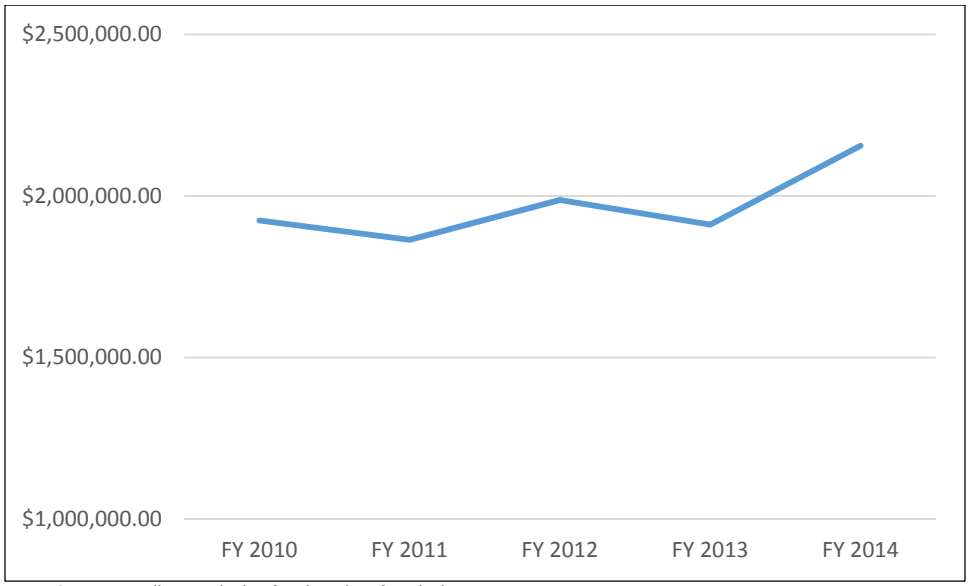
Figure 3.1 also shows that UPCC operating expenses rose from $2.1 million in fiscal 2010 to $2.5 million in fiscal year 2014, an 18 percent increase during this time. Personnel expenses, such as employee wages and benefits, accounted for 60 percent of the expense increase, while non-personnel expenses accounted for 40 percent. Overall, personnel expenses constituted 87 percent of UPCC's operating expenses from fiscal years 2010 through 2014, while non-personnel expenses constituted 13 percent.

Operating expenses increased by 18 percent from 2010 to 2014.

Increasing Employee Wages Contribute to Increased Personnel Costs. Employee wages constitute a large portion of UPCC's personnel expenses. From fiscal years 2010 to 2014, employee wages comprised 76 percent of personnel expenses. Figure 3.2 shows increases in personnel expenses from fiscal years 2010 to 2014.

Employee wages comprise 76 percent of personnel expenses.

Figure 3.2 Personnel Expenses from Fiscal Years 2010 through 2014.



Source: Auditor analysis of University of Utah data

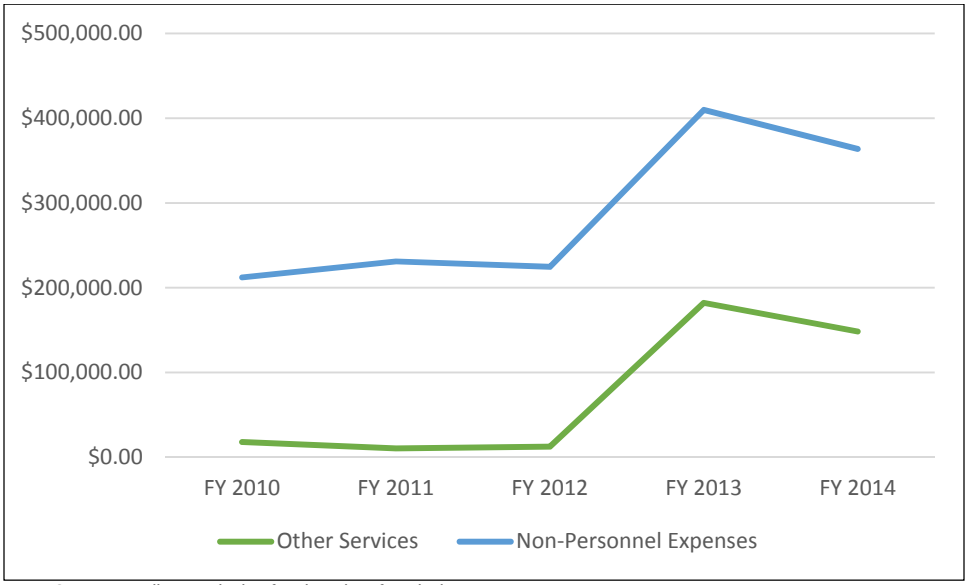
Personnel expenses increased 12 percent during fiscal years 2010 to 2014. However, these expenses fluctuated during this time, increasing

the most from fiscal year 2013 to 2014. Expenses rose from $1.9 million in fiscal year 2013 to $2.2 million in fiscal year 2014, an increase of roughly 13 percent. Increasing wages contributed significantly to this increase.

The Majority of the Other Services Account Expenses Were Personnel-Related. From fiscal years 2010 to 2014, roughly 26 percent of expenses classified as non-personnel occurred in the Other Services cost account. We found that most expenses credited to this account during fiscal years 2013 and 2014 were actually personnel-related. As shown in Figure 3.3, increased costs within the account significantly impacted non-personnel expenses.

The Other Services cost account made up 26 percent of non-personnel costs. However, the majority of these costs were personnel-related.

Figure 3.3 Other Services Account Expenses Relative to Total Non-Personnel Expenses from Fiscal Years 2010 through 2014.



Source: Auditor analysis of University of Utah data

From fiscal year 2012 to fiscal year 2013, account costs grew from $12,000 to $182,000, an increase of roughly 1,300 percent. The fiscal year 2013 total constituted about 44 percent of UPCC's non-personnel expenses for fiscal year 2013. The dramatic increase was caused by UPCC contracting for medical director services from another poison center and crediting the expenses to the Other Services account.

Prior to fiscal year 2013, UPCC employed a full-time onsite medical director, but the position was vacated in July 2012. In

response, UPCC contracted for medical director services from another poison center. Services included instruction for students, on-call consultation, and review of cases involving hospitalization. UPCC hired another full-time director in October 2013, but the director's employment ended in July 2014. Consequently, UPCC again contracted for medical director services from the same poison center. UPCC also contracted with a local medical doctor to review hospital cases and perform on-call duties. UPCC continues to maintain this arrangement for its medical director services.

As mentioned, costs for contracted medical director services had a large impact on non-personnel costs during fiscal years 2013 and 2014. UPCC spent roughly $106,000 in fiscal year 2013 and $78,000 in fiscal year 2014 on contracted director services. UPCC also spent approximately $49,000 in fiscal year 2013 and about $55,000 in fiscal year 2014 for on-call services from the local doctor. As can be seen, even UPCC's rising "non-personnel" costs were driven by personnel costs.

UPCC spent $106,000 in 2013 and $78,000 in 2014 for contracted medical director services, which were categorized as non-personnel costs.

UPCC Officials Intend to Hire a Full-Time Medical Director. UPCC officials told us they did not have a full-time medical director and chose to contact director services in order to maintain accreditation. UPCC's director admits the current arrangement is more costly to UPCC, but is working to hire a full-time medical director in the near future.

Inbound Call Costs Have Increased Over the Past Five Years

Decreasing inbound call volume, increasing time actually spent on inbound calls, and increasing compensation levels are contributing to increasing costs per inbound call at UPCC. Specialists in poison information (SPIs) answer the vast majority of inbound calls received by UPCC. Therefore, call activity among SPIs is a good indicator of inbound call costs for UPCC overall.

We found that the total inbound calls received by SPIs from fiscal year 2010 to 2014 decreased by 18 percent. However, the average time SPIs spent talking to callers on each inbound call increased by 10 percent. In addition, the average annual compensation package (salary and benefits) received by a SPI increased 21 percent during the same period (Note: this percentage does not reflect changes in total UPCC personnel costs but only considers SPI salaries and benefits). We

Total inbound calls taken by SPIs decreased by 18 percent from 2010 through 2014.

believe these elements contributed to increased costs per inbound call for SPIs.

When calculating cost per inbound call for SPIs, we took their inbound calls totals into consideration as well as the total time they spent on inbound calls and how much of their compensation was dedicated to inbound call time. Figure 3.4 shows the cost per inbound call for SPIs over the past five fiscal years.

Figure 3.4 Cost per Inbound Call for SPIs: Fiscal Years 2010 through 2014.

Fiscal Year	Cost per Inbound Call
2010	$2.46
2011	2.57
2012	2.81
2013	2.71
2014	$2.92

Source: Auditor analysis of Utah Poison Control Center and University of Utah data

In fiscal year 2010, the cost per inbound call was $2.46. This amount rose to $2.92 per inbound call in fiscal year 2014, an increase of 19 percent. UPCC officials believe the increase was caused by cases becoming more complex and therefore requiring more time. We were unable to substantiate this claim because UPCC lacks metrics to track call complexity. However, we acknowledge that time is a likely indicator of call complexity. UPCC needs to develop other measures in addition to call time that help indicate the complexity of calls from year-to-year.

UPCC Should Develop Metrics and Consider Modifying Its Staff Composition

The UPCC does not use metrics to determine the cost efficiency and effectiveness of its poison information specialists.

UPCC does not use metrics to determine the cost efficiency and effectiveness of its SPIs and should establish what needs to be measured. UPCC claims that increasing time spent on inbound calls is caused by increased call complexity. Our analysis suggests efficiency can be measured by exploring the composition of UPCC's staff. Modifications to staffing structure could bring about improved operational efficiency. Poison centers use staffing structures that heavily rely on either pharmacist SPIs or nurse SPIs, depending on centers' affiliation to sponsoring organizations. UPCC uses a balanced

staffing structure that differs from other poison centers possessing a similar affiliation. UPCC's pharmacist SPIs answer inbound calls at a lower average cost per call than nurse SPIs answer them and reportedly possess different technical expertise. In addition, 50 percent of UPCC's nurse SPIs receive salaries exceeding their pay grade maximum. Finally, UPCC could consider using poison information providers (PIPs) as a low-cost alternative for answering low-risk inbound calls.

Pharmacist poison specialists answer inbound calls at a lower average cost per call than nurse poison specialists.

UPCC Needs to Establish Metrics Measuring Cost Efficiency

We found that UPCC lacks metrics to adequately measure SPI cost efficiency and effectiveness. However, UPCC currently uses metrics to measure the overall job performance of SPIs. While these measures have value, they do not address the cost efficiency and effectiveness of SPI phone work. UPCC claims the duration of calls continues to increase because of the increasing complexity of calls. As mentioned, we believe time is an indicator of call complexity. But other indicators that likely contribute to call complexity need to be determined, such as the level of expertise used and the changing nature of the cases. We asked UPCC officials if documentation existed supporting their claims of increased call complexity, but were told documentation does not exist.

The UPCC measures overall job performance of poison specialists but does not adequately measure their cost efficiency and effectiveness.

Based on our review of UPCC's current performance metrics for SPIs, we believe UPCC should develop metrics that communicate the cost efficiency of SPI performance. UPCC should develop metrics tracking call complexity, in addition to call duration, to validate the claims made by UPCC officials.

Poison Center Staffing Structures Vary Dramatically

Poison center staffing structures vary according to centers' affiliations with sponsoring organizations. We contacted 14 poison centers across the country and found they were either affiliated with a university or hospital or operated as an independent, non-profit organization. Each had varying staffing structures, although commonalities existed between poison centers according to their affiliation. Figure 3.5 lists the affiliations of the poison centers contacted as well as the types of SPIs employed.

Figure 3.5 Poison Center Affiliations and Staffing Structures. Poison control centers affiliated with university colleges of pharmacy almost exclusively employ pharmacists as SPIs.

Poison Center	Affiliation	Number of SPIs Employed		
		Pharmacist	Nurse	Other
Arizona Poison and Drug Information Center	University--College of Pharmacy	12	0	0
California Poison Control System--San Francisco	University--College of Pharmacy	12	0	0
New Mexico Poison & Drug Information Center	University--College of Pharmacy	12	0	0
Oklahoma Center for Poison & Drug Information	University--College of Pharmacy	10	2	0
Utah Poison Control Center	**University--College of Pharmacy**	**7**	**4**	**0**
Florida Poison Information Center--Jacksonville	University--Other	2	12	1
Oregon Poison Center	University--Other	1	18	0
Banner Poison & Drug Information Center (Arizona)	Hospital	0	25	0
Missouri Poison Center	Hospital	3	22	0
Nebraska Regional Poison Center	Hospital	0	16	0
Kansas Poison Control Center	Hospital	1	6	1
Michigan Poison Control Center	Hospital	1	13	4
Rocky Mountain Poison & Drug Center	Hospital	1	25	0
Iowa Poison Control Center	Independent Non-Profit	1	12	0
Washington Poison Center	Independent Non-Profit	9	5	0

Source: Data provided by participating poison control centers

As shown in Figure 3.5, poison centers affiliated with universities and their respective colleges of pharmacy primarily employ pharmacist SPIs. Poison centers affiliated with a university, but not a college of

pharmacy, primarily employ nurse SPIs. Poison centers affiliated with hospitals almost exclusively employ nurse SPIs as well. UPCC maintains an affiliation with the University of Utah's College of Pharmacy, but does not use a staffing structure similar to other poison centers affiliated with colleges of pharmacy. UPCC currently employs seven pharmacist SPIs and four nurse SPIs. UPCC may want to research the possible benefits of using an all-pharmacist SPI staff structure. As shown, multiple poison centers use pharmacist-heavy staffs, which may be more cost efficient. We will explore the cost efficiency of pharmacist SPIs in the next section.

Poison centers affiliated with hospitals generally employ nurse specialists as opposed to pharmacist specialists.

Pharmacist SPIs Are Now More Cost Efficient than Nurse SPIs

Pharmacist SPIs answer inbound calls at lower cost to UPCC than nurse SPIs. It appears pharmacist SPIs are more cost efficient at answering inbound calls. Figure 3.6 shows the cost per inbound call for pharmacist and nurse SPIs from fiscal years 2010 to 2014.

Figure 3.6 Cost per Inbound Call for Pharmacist & Nurse SPIs: Fiscal Years 2010 through 2014.

Fiscal Year	Cost per Inbound Call	
	Pharmacist	Nurse
2010	$2.57	$2.39
2011	2.62	2.54
2012	2.95	2.71
2013	2.70	2.72
2014	$2.80	$3.07

Source: Auditor analysis of Utah Poison Control Center and University of Utah data

Over Time, Pharmacist SPIs Became More Cost Efficient at Answering Calls than Nurse SPIs. Nurse SPIs answered inbound calls at a lower cost than pharmacist SPIs from fiscal years 2010 to 2012. However, pharmacist SPIs began answering inbound calls at a lower cost in fiscal year 2013, and the trend continued through fiscal year 2014. The shift likely occurred due to decreased inbound calls taken by nurses, an increase in the average amount of time spent by nurses on individual inbound calls, and higher average compensation for nurses. Conversely, pharmacists began taking more inbound calls, spent less time, on average, on individual inbound calls, and had average compensation lower than nurses. In essence, nurse SPIs are

Pharmacists' costs per call have been lower than nurses since 2013 due to taking more inbound calls, and taking less time on these calls as well as receiving lower compensation, on average, compared to nurse poison specialists.

more costly to UPCC than pharmacist SPIs and are less efficient at answering inbound calls.

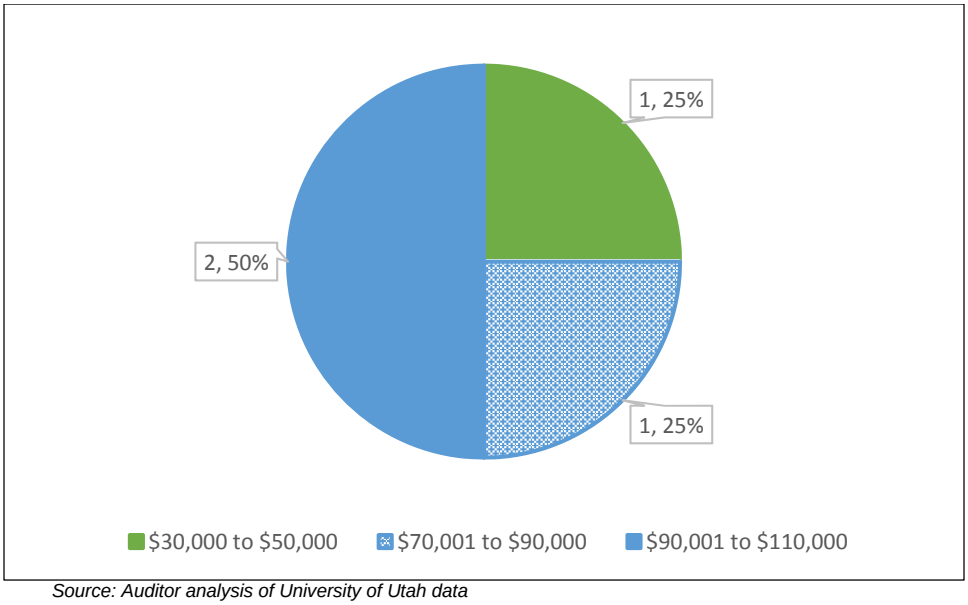
The pharmacists' advanced degrees may contribute to increased efficiency at answering inbound calls.

In addition to our analysis, we spoke with UPCC's executive director regarding pharmacist and nurse efficiency. The director believes pharmacist SPIs' advanced degrees in pharmacy contribute to different technical expertise. This expertise may also contribute to the pharmacists' increased efficiency at answering inbound calls.

Higher salaries drive higher costs per inbound call.

Higher salaries appear to drive higher costs per inbound call. For instance, salaries for some nurse SPIs exceed the pay grade maximum. The nurse SPI salary pay grade ranges from $46,900 to $89,000 with a median salary of $68,000. As mentioned, UPCC currently employs four nurse SPIs. Two of the four nurse SPIs had salaries exceeding the pay grade maximum in fiscal year 2014. As shown in Figure 3.7, this constitutes half of the current nurse SPIs. One nurse SPI earned a salary above the median salary of $68,000.

Figure 3.7 Salary Distribution for Nurse SPIs.



Source: Auditor analysis of University of Utah data

We found that UPCC employs SPIs who came from other departments within the University of Utah. When SPIs transfer from other departments, UPCC compensates them at the same pay rate received in their previous positions. In light of this and pharmacists having a lower cost per call rate, UPCC may want to re-examine hiring nurses at high pay rates to help control costs. UPCC should

consider natural attrition and turnover of staff as opportunities for controlling costs as well.

Poison Information Providers (PIPs) Could Be More Fully Utilized to Lower Operational Costs

Poison information providers or PIPs complete a myriad of tasks for UPCC. PIPs are utilized by UPCC and other poison centers throughout the country. We found that at least eight of the poison centers we contacted use PIPs, two of which were affiliated with university colleges of pharmacy (Arizona Poison and Drug Information Center and New Mexico Poison and Drug Information Center). UPCC uses its PIPs to conduct customer satisfaction surveys, complete quality assurance functions, conduct follow-up calls with patients, answer inbound calls on a limited basis, and contribute to UPCC projects. We found other poison centers use PIPs for similar tasks. Currently, UPCC employs University of Utah pharmacy students as PIPs.

Poison Information Providers can be low-cost alternatives to specialists in answering lower-risk-exposure calls and informational calls.

PIPs could act as low-cost alternatives to SPIs in answering lower-risk-exposure calls and informational calls (providing poison and drug information and identification). The use of PIPs could help UPCC with the recruiting and training of future SPIs as well. In December 2014, UPCC hired additional PIPs to answer calls relating to non-toxic substance exposures. Going forward, UPCC officials plan to use PIPs more extensively for informational and non-toxic substance exposure calls, which are less complex in nature. SPIs will continue to address more complex calls. We believe UPCC could use PIPs more extensively to lower operational costs.

Recommendations

1. We recommend that UPCC continue to assess its operations by developing and tracking metrics that determine the effectiveness and efficiency of SPIs.

2. We recommend that UPCC study and determine the appropriate combination of pharmacist and nurse SPIs to maximize efficiency and effectiveness.

3. We recommend that UPCC conduct further study into the use of PIPs as a means of increasing efficiency and reducing personnel costs.

Appendices

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Appendix A

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OLRGC
Office of Legislative Research and General Counsel

Michael E. Christensen
Director

John L. Fellows
General Counsel

Darin Underwood, Audit Manager
Office of the Legislative Auditor General
W315 House Building
Utah State Capitol Complex
Salt Lake City, UT 84114

June 17, 2015

Dear Darin:

This letter responds to two questions you asked in relation to an occupancy arrangement between the Utah Poison Control Center ("UPCC") and the University of Utah ("University"). The first question is, if the University disassociates[1] with the UPCC, will the UPCC have a claim to all or part of the $2.5 million that the UPCC transferred to the University to facilitate its occupancy within the Skaggs Pharmacy Building. The second question is whether the University is legally required to allow the UPCC's occupancy of the Skaggs Pharmacy Building to continue. Those questions are answered below.

1. If the UPCC is disassociated from the University of Utah, what claim would the UPCC have to all or part of the $2.5 million it transferred to the University for occupancy in the Skaggs Pharmacy Building?

Short Answer: The UPCC may have a claim for full or partial recovery of the $2.5 million under Utah's equitable doctrine of *quantum meruit*.

In 2010, the UPCC transferred $2.5 million to the University of Utah to obtain housing at the University's Skaggs Pharmacy Building.[2] The parties did not formalize the transfer with any written contract or similar agreement. According to the UPCC, the funds were used in the

[1] The UPCC transferred $2.5 million from 2008 through 2010, to the University with the understanding that the UPCC would have long-term accommodations at the Skaggs Pharmacy Building. According to the director of the UPCC, the $2.5 million was applied to the pharmacy building's construction cost. It appears that this agreement was never reduced to writing. "Disassociation," in the context of this letter, refers to the University no longer allowing occupancy of the Skaggs Pharmacy Building by the UPCC.

[2] All factual statements made in this letter are based on information obtained by the Office of Legislative Research and General Counsel (OLRGC) from the Office of the Legislative Auditor General. The OLRGC does not have independent knowledge of these facts.

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construction of the pharmacy building. In 2014, at least 4 years after the transfer of funds by the UPCC, the Interim Dean of the College of Pharmacy at the University of Utah attempted to formalize the occupancy agreement between the UPCC and the University, through the delivery of a letter to the UPCC.[3] The letter could have some bearing on a future court's determination of the UPCC's claims against the University if the parties' disassociate; however, it does not have any formal, legally binding effect.

Because there is no written contract covering the transfer of funds and subsequent housing in the event of disassociation, the UPCC would need to seek equitable relief to receive all or part of its payment to the University. Utah courts recognize claims based on *quantum meruit*, an equitable tool that provides "a plaintiff restitution for the reasonable value of services provided to the defendant."[4] The doctrine is "rooted in 'justice' to prevent the defendant's enrichment at the plaintiff's expense."[5]

To establish one form of *quantum meruit*, a contract implied in law, the plaintiff must establish:

> (1) [T]he defendant received a benefit; (2) an appreciation or knowledge by the defendant of the benefit; (3) under circumstances that would make it unjust for the defendant to retain the benefit without paying for it.[6]

First, the University received a benefit when it accepted $2.5 million dollars in payment from the UPCC. To constitute a benefit, the defendant must receive "a true windfall or 'something for nothing.'"[7]

In *Richards v. Brown*,[8] the Utah Court of Appeals addressed a contract implied in law claim for an interest in respondent-homeowner's home based on payments made by petitioner to the respondent-homeowner during the period they cohabitated.[9] The petitioner, without a contract,

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[3] A copy of the letter is attached.
[4] *Emergency Physicians Integrated Care v. Salt Lake County*, 2007 UT 72, ¶ 10, 167 P.3d 1080.
[5] *Davies v. Olson*, 746 P.2d 264, 269 (Utah Ct. App. 1987) (citation omitted).
[6] *Emergency Physicians Integrated Care*, 2007 UT 72, ¶ 11.
[7] *Id.* at 26.
[8] 2009 UT App 315, 222 P.3d 69.
[9] *Id.* at ¶ 31.

paid $71,000 over a ten-year period towards the home's mortgage, averaging roughly $600 a month.[10] In denying the petitioner's claim for a contract implied in law, the court held that the payments to respondent-homeowner did not constitute a benefit.[11] Rather, the payments provided the petitioner with a place to live, and were roughly similar to what the petitioner would have paid had he made rental payments in the surrounding community.[12] The respondent-homeowner gained no windfall profits, and thus the plaintiff's claims were denied.

In contrast to *Richards*, if the UPCC and the University become disassociated, a windfall benefit would accrue to the University, due to the immense size of the payment from the UPCC. After deducting costs for the UPCC's current annual rent, the University would receive a substantial windfall profit from the payment. But, the longer the relationship between the parties continues, the amount the UPCC may be able to recover will decrease.

Second, the University has actual knowledge of the benefit provided by the UPCC. The University knowingly accepted the payment from the UPCC. The $2.5 million provided by the UPCC was used to pay for the Skaggs Pharmacy Building and reduced the amount payable by the University.

Third, it is likely the University would be unjustly enriched, upon the parties' disassociation. To constitute an unjust enrichment, the benefit to the defendant must be more than just "an incidental benefit from the plaintiff's service."[13] The Utah Supreme Court has held that an interest in money, land, chattels, choses in action, beneficial services conferred, satisfaction of a debt or a duty, or anything which adds to a defendant's security or advantage can be sufficient to establish an unjust enrichment.[14] Were the parties to disassociate, it is likely that the University would receive a large windfall, in the form of equity in the Skaggs Pharmacy Building, beyond the cost for the UPCC's cumulative annual rent.

[10] *Id.* at ¶¶ 31, 33.
[11] *See id.* at ¶¶ 31–33.
[12] *Id.*
[13] *Emergency Physicians Integrated Care*, 2007 UT 72, ¶ 26.
[14] *Id.*

Thus, the UPCC may have a claim for full or partial recovery of the $2.5 million under a contract implied in law.

2. Is the University of Utah legally required to house the UPCC?

Short Answer: No.

There are no statutes in the Utah Code, or regulations in Utah's administrative rules, linking the UPCC and the University. Consequently, the University is under no obligation to continue housing the UPCC in the future.

Conclusion

If the University acts to disassociate itself from the UPCC, the University is not legally required to continue to provide space to the UPCC, but may be required to return all or a part of the $2.5 million to the UPCC under the equitable doctrine of *quantum meruit*. However, the best course of action may be for the University and the UPCC to reduce their informal agreement to writing. Alternatively, the Legislature may want to consider formalizing the agreement in statute.

UNIVERSITY OF UTAH
COLLEGE OF PHARMACY
L. S. SKAGGS PHARMACY INSTITUTE

November 25, 2014

Barbara Crouch
Utah Poison Control Center
University of Utah
30 South 200 East
Salt Lake City, UT 84112

Barbara,

The University of Utah, College of Pharmacy agrees to allow the use of 5,600 square feet of space located on the forth floor of the L. S. Skaggs Jr. Research Building, located at 30 South 2000 East, at no cost to the Utah Poison Control Center (UPCC).

This agreement shall remain in place until such time that the Utah Poison Control Center becomes disassociated with the University of Utah or the center is no longer in operation.

This agreement covers only the space itself and does not cover any resources necessary for the day-to-day operations or running of the UPCC.

Kristen A. Keefe
Interim Dean and Professor
University of Utah
College of Pharmacy

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Agency Response

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June 15, 2015

John M. Schaff, CIA
Auditor General
Office of the Legislative Auditor General
W315 Utah State Capitol Complex
PO Box 145315
Salt Lake City, UT 84112

Dear Mr. Schaff:

Thank you for the opportunity to review and respond to the performance audit of the Utah Poison Control Center (UPCC) conducted by the Office of the Legislative Auditor General. The results of this audit will help the UPCC implement its strategic goals to ensure that we continue to provide high quality service to the people of Utah and remain a vital part of the public health infrastructure and a value to state.

On behalf of the entire Utah Poison Control Center staff, we appreciate the extremely professional manner in which the audit was conducted. In addition to conducting themselves with utmost professionalism, the auditors were polite, thorough, hardworking, courteous and unobtrusive.

Chapter II: Legislature Should Consider Formally Defining UPCC's Mission

Recommendation 1: Legislature consider statutorily defining the mission of the Utah Poison Control Center and its functions within the State of Utah

We agree that the legislature should consider statutorily defining the mission of the Utah Poison Control Center and its functions within the State of Utah.

Research is an important part of the mission of the UPCC's mission. Research into the frequency of poisonings in Utah is important to both our service and education missions. Further, we are currently involved in research that will help improve operational efficiencies. In addition we regularly conduct needs assessments to evaluate trends in Poisoning in Utah that help direct our outreach education programs. Finally, we regularly review poison center data to identify specific public health hazards and trends in poisoning. All are types of research. The latter two (needs assessment and data surveillance) are required by the American Association of Poison Control Centers to meet its accreditation standards, although it is not explicitly called research in the accreditation requirements.

We look forward to the opportunity to work with the legislature to define the mission of the UPCC in State statute.

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Recommendation 2: Legislature consider defining the Utah Poison Control Center's relationship with the University

We agree with the audit findings.

Recommendation 3: Utah Poison Control Center and the University of Utah develop a contract that outlines the subletting of space to the Utah Poison Control Center at the University of Utah at no charge

We agree with the audit findings and will work with the College of Pharmacy to develop a long-term contract that allows the UPCC to remain at the University of Utah at no charge.

Chapter III: UPCC Can Improve Its Delivery of Service

Recommendation 1: UPCC continue to assess its operations by developing and tracking metrics that determine effectiveness and efficiency of SPIs

We agree with the audit findings and will continue to review current metrics and explore additional metrics that will help us track efficiency and effectiveness of SPIs.

Recommendation 2: UPCC study and determine the appropriate combination of pharmacist and nurse SPIs to maximize efficiency and effectiveness

We agree with the audit findings and will continue to evaluate the best staffing mix to maximize UPCC's efficiency and effectiveness.

Recommendation 3: Conduct further study into the use of PIPs as a means of increasing efficiency and reducing personnel costs

We agree with the audit findings and will continue to evaluate the value of poison information providers (PIPs) to increase UPCC efficiency and reduce personnel costs.

In conclusion we concur with all of the findings in the Performance Audit of the Utah Poison Control Center (Report 2015-08) conducted by the Office of the Legislative Auditor General.
Thank you for the opportunity to work with such a professional team of auditors.

Sincerely,

Barbara Insley Crouch

Barbara Insley Crouch, PharmD, MSPH
Executive Director
Professor (Clinical), Pharmacotherapy

Cc: Kristen A. Keefe, PhD, Interim Dean, College of Pharmacy
David H. Browdy, Associate Vice President for Finance and CFO, Health Sciences
Jason Perry, Vice President for Government Relations

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