

MEDICATION ADMINISTRATION POLICIES & PROCEDURES

Applicability: This policy applies to all Oak Hill employees who are required or authorized to administer medications.

TRAINING AND CERTIFICATION TO ADMINISTER MEDICATIONS

Any Oak Hill employee who is required to administer medications to program participants as part of his/her job duties and responsibilities shall be a licensed professional pursuant to Connecticut state law or become certified to administer medications pursuant to the regulations and procedures of the Connecticut Department of Developmental Services (DDS) as a Certified Non-licensed Personnel (CNP). Employees in direct support positions or who may be required to perform direct support duties are required to become certified (see Oak Hill's Medication Certification Policy for details on the requirements for CNPs.) Under Connecticut state law, a CNP administers medication as a delegated task under the supervision and oversight of a registered nurse ("RN"). CNPs are required to have their medication administration cards in their possession at all times when at work. CNPs must complete the requirements for re-certification prior to the expiration date on their cards.

MEDICATION VIOLATIONS

Employees who are required to administer medications shall receive sufficient training in Oak Hill's medication policies and procedures. The purposes of these policies and procedures is to protect the health and safety of Oak Hill's program participants and to ensure that medication is administered in accordance with applicable law and appropriate professional standards. Consequently, an employee who does not follow these policies and procedures may be cited for a medication administration policy violation and subject to sanctions and/or disciplinary action.

Oak Hill recognizes the following types of medication administration violations:

I. Violations in Procedures, Documentation and Generally Accepted Practices

By virtue of their documented training and their licenses or CNP designation, employees are determined to have demonstrated competency in the practices and procedures associated with the administration of medication. To ensure that the life and health of every individual is scrupulously safeguarded, licensed employees and CNPs will carry out all procedures in accordance with their training. Any violations related to documentation and generally accepted procedures or practices will be documented by the supervising RN. These violations include but are not limited to:

a. Failing to:

- Secure the keys to the medication cabinet
- Lock the medication cabinet
- Ensure that an employee's personal medication is secure and inaccessible to program participants
- Provide all required information on single dose drugs for program participants who are on "leaves of absence"
- Report a medication administration policy violation immediately upon occurrence/detection and complete appropriate documentation of such violation
- Recognize adverse reactions to medications and report them immediately
- Store drugs which require refrigeration in a locked container in the refrigerator
- Verify physician's orders prior to each medication administration to determine if an increase, decrease or discontinuation has been ordered
- Supervise program participants on self-administration programs

b. Providing documentation that is improper or incomplete, such as:

- Using white-out
- Crossing out an entry – without initialing and correcting
- Using pencil to sign for medications
- Failure to sign/date for medications given
- Failure to complete all required information on the Kardex

II. Violations of Rights

a. Violation of the "Five Rights":

- Failure to administer medication to the individual for whom it is prescribed.
 - Failing to give the individual his/her medication
 - Giving the medication to the wrong person
- Failure to administer medication within a one-hour time frame of the designated time
 - More than 30 minutes before the designated time
 - More than 30 minutes after the designated time
- Failure to administer the specific medication prescribed for an individual
 - Giving the person the wrong medication
- Failure to administer medication by the correct route; for example, putting eye drops in the ears
- Failure to administer the correct dose

- o Giving less or more than the prescribed dose
- b. Use of prohibited techniques such as, but not limited to, unauthorized employees taking physician orders, improper storage or destruction of medications, “pre-pouring’ medications, etc.
- c. Transcription, documentation, and ordering and supply violations resulting in the violation of one of the five rights

III. Most Serious Violations.

Most serious violations include, but are not limited to:

- a. Medication violations resulting in the death or serious injury of a program participant, e.g., hospitalization, injury requiring treatment in a medical facility such as ER, clinic, or physician’s office
- b. Prohibited practices such as but not limited to:
 - Administration of medications in the absence of a valid medication certificate (e.g., certificate was suspended, revoked, expired, etc.)
 - Failure to document and report inability to reconcile controlled drugs
 - Signing for medications not administered
 - Signing another employee’s name or initials to forms
 - Any other falsification of a program participant’s medication records or any documentation associated with certification

Any single violation of the medication administration policy may fall into more than one category depending on the circumstances involved.

MEDICATION INCIDENT

A medication incident, which is in and of itself not a medication violation, involves a situation that negatively impacts on the health of the program participant and that may be attributable to medication he/she is taking or not taking. Examples include:

- A program participant’s refusal to take medication
- After taking medication, a program participant has a noteworthy adverse reaction (e.g., vomiting, chills, perspiration, skin rash, agitation, sleepiness, sleeplessness or fever, among others). Note that specific adverse reactions associated with specific medications are detailed in the Drug Handbook available at each Oak Hill program site.

NOTIFICATION PROCEDURES

If a medication administration policy violation or medication incident occurs (as defined in this policy), the following notification procedures will be implemented:

Any Oak Hill employee discovering a violation of this policy must immediately notify the supervising RN for the location. The supervising RN will assess the situation and, as warranted, will recommend additional follow-up by the employee. The employee must also speak directly to a supervisor, moving up the chain of command as appropriate. Voice mail messages are not sufficient. The employee must complete a DDS 255m incident report before the end of the shift, detailing any notifications and remedial actions taken. Any employee who is determined to be responsible for the medication violation by the supervising RN will also be required to complete a DDS 255m incident report pertaining to his/her specific violation. The designated site supervisor or RN will contact the program participant's guardian. In ICF/MR locations, the designated site supervisor or RN shall notify the program participant's physician of the medication violation. In CLAs, the designated site supervisor or RN will notify the program participant's physician as warranted.

If a medication violation or adverse reaction occurs and the affected program participant becomes very ill soon thereafter, emergency medical treatment may be needed. This includes EMT services or admission to the emergency room, hospital or walk-in clinic. In such situations, an employee shall contact the physician, supervising RN and site manager immediately. The manager will notify the program supervisor who, in turn, will contact the administrator in charge and Planning and Support Team members, including the parents, guardians or advocate. If the life, health or safety of the program participant is in jeopardy, the appropriate Oak Hill administrator will verbally and immediately notify the Health Services Coordinator in the appropriate DDS Region and the DDS Division of Quality Assurance. As appropriate, other Oak Hill administrators also will also be notified. Any adverse reaction shall be reported to the physician immediately.

DOCUMENTATION PROCEDURES

Medication violations shall be documented by the responsible employee before the end of the shift on which the violation occurred. The DDS Medication Error Report Form (Form #255m) will be used for this documentation and, when completed and reviewed/signed by the RN assigned to the location, shall be distributed as required as soon as possible. Medication incidents (as defined in this policy) shall be documented by the responsible employee before the end of the shift on which the incident occurred. The DDS Incident Report Form (Form #255) will be used for this documentation.

Additional documentation, as specified by the RN may include the Kardex, shift-to-shift log, significant events log and nursing notes.

If emergency medical treatment is required as an apparent result of a medication administration policy violation or because of an adverse reaction, the pertinent details will be recorded on the 255m Form. A copy of the completed Form as well as any other written reports required by a designated Oak Hill administrator will be submitted to that administrator within 24 hours. Within 48 hours, Oak Hill will submit copies of the Form and any additional reports to the appropriate DDS Regional contact person.

QUALITY ASSURANCE

When a medication administration policy violation is reported to or detected by the RN assigned to the location, he/she will determine whether or not the responsible employee should continue to administer medication prior to being retrained. The scope and depth of the training will be determined and completed by the RN as soon as possible, documented on the In-Service Training form, and maintained at the program site and in the Staff Development office.

However, if an individual requires emergency medical treatment and the physician or RN determines that it is directly attributable to a medication administration policy violation or employee action or inaction (example: failure to recognize and monitor an adverse reaction and to act immediately and appropriately), the responsible employee will cease to administer any medication to any program participant until all related documentation has been reviewed by the physician or RN and supervisory staff. Their conclusions and recommendations will be presented to the appropriate Oak Hill administrator for consideration and possible action.

If an employee fails to administer medication in accordance with the training received or in any other way fails to comply with Oak Hill policies and procedures and/or DDS regulations, a sanction request may be submitted to the appropriate DDS Health Services Coordinator. (See SANCTIONS, below.) Such action may be warranted if an employee is responsible for multiple violations or for one violation which seriously compromises the health of an individual. The report recommending sanctions must be filed within five (5) working days from the date that the registered nurse or physician determines a request for sanctions is in the program participant's best interests. Such report shall include, but not be limited to, the following information:

- The employee's name
- The name and address of the program site (residence, work or education) in which he/she works
- The specific policy provisions with which the employee failed to comply
- Copies of any documents and reports which substantiate the allegations
- Recommendation of sanctions for each alleged violation
- Signature of registered nurse and/or physician submitting the report and the date
- Signature of the appropriate Oak Hill administrator and the date
- Appropriate cover letter

A copy of the report will be provided to appropriate Oak Hill administrators.

RETRAINING

Each time that an employee commits or engages in a medication administration policy violation, the delegating registered nurse will retrain the employee in the area(s) specific to the particular violation. Proper documentation of retraining will be maintained at the program site and the Staff Development office.

SANCTIONS

Any employee who violates any provision of this policy is subject to additional retraining including the requirement of having a registered nurse or other designated professional employee monitor medication administration over a specified period of time. Pursuant to applicable provisions of the DDS regulations and procedures concerning the administration of medication, sanctions may be imposed upon the affected employee including the suspension or revocation of certification to administer medications. Affected employees are entitled to any appeal or other procedural protections provided by applicable regulations and procedures of DDS. A licensed professional is subject to any sanctions that may be imposed by appropriate regulatory bodies including, but not limited to, license suspension or revocation.

In addition to DDS sanctions, Oak Hill may limit or restrict an employee's ability to administer medication for a period of time. Since a CNP administers medication as a delegated task under the supervision and oversight of a RN, the delegating RN may determine that a CNP is not qualified to continue to administer medications. This determination will be based on the number and level of medication violations, the employee's responsiveness to retraining and a conclusion that the health and safety of program participants will be jeopardized if the employee is allowed to continue to administer medication. If an employee's ability to administer medication is permanently restricted, a determination will be made as to that individual's continued qualifications to hold his/her present job.

If any policy violation in the administration of medication constitutes abuse or neglect of a program participant as defined by applicable state law, a report of such suspected abuse or neglect shall be made in accordance with Oak Hill policies and applicable state law.

DISCIPLINARY ACTION

In addition to retraining and sanctions, Oak Hill may take disciplinary action against any employee who commits or engages in a medication [administration policy](#) violation. Any disciplinary action taken will be based on:

- the category and seriousness of violation incident;
- the past violation record of the employee;
- the actual or potential effect of the violation on the program participant.

Oak Hill typically implements disciplinary action in a progressive manner; however, this may be modified based on the three criteria noted above. Some violations may result in significant discipline, including discharge, for a first offense. Any violation will be reviewed by at least one supervisor and the RN. Other Oak Hill administrators may review the violation incident to ensure a complete review and to develop a sound remedial plan for the affected employee.

At the suspension level of disciplinary action for medication administration violations, the process will include:

- suspension without pay as per Oak Hill's disciplinary policy;
- revocation of medication administration privileges within Oak Hill programs;
- successful completion of Oak Hill Medication Review class offered by Staff Development
- successful completion of Checklist B, and section 3 of Checklist A with the RN assigned to the location, in order to restore medication administration privileges;
- possible recommendation for final warning status.

See Policies on Nurse Delegation and Medication Certification

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