



## Use of Medication Policy

### Policy

Wellspring Community will ensure that all medications (prescription or non-prescription) are provided in accordance with 6 Colorado Code of Regulations 1011-1 Chapter 24 and 10 Colorado Code of Regulations 2505-10 8.609.6 Comprehensive Habilitation Services and Supports Medical, Therapy, and Medical Provisions.

Wellspring Community will provide support to STARS needed for the safe administration, use, and storage of medications. These supports will be based on the abilities and needs of each STAR, determined from individual assessment.

### Definitions

Administration: means assisting a person in the ingestion, application, inhalation, or, using universal precautions, rectal or vaginal insertion of medication, including prescription drugs, according to the legibly written or printed directions of the attending physician or other authorized practitioner or as written on the prescription label and making a written record thereof with regard to each medication administered, including the time and the amount taken, but "administration" does not include judgment, evaluation, or assessments or the injections of medication, the monitoring of medication, or the self-administration of medication, including prescription drugs and including the self-injection of medication by the resident.

- ✓ "Administration" also means ingestion through gastrostomy tubes or naso-gastric tubes, if administered by a person authorized pursuant to section 25.5-10-204(2) (j)

Colorado Department of Public Health and Environment (CDPHE): a regulatory agency that serves Coloradans by providing public health and environmental protection services that promote healthy people in healthy places. Public health professionals use evidence-based practices in the public health and environmental fields to create conditions in which residents can be healthy.

Health Care Policy and Finance (HCPF): a regulatory agency that oversees and operates Health First Colorado (Colorado's Medicaid program), Child Health Plan *Plus* (CHP+), and other public health care programs for Coloradans who qualify.

Human Rights Committee (HRC): a third-party mechanism to adequately safeguard the legal rights of persons receiving services by participating in the granting of...

- ✓ informed consent
- ✓ monitoring the suspension of rights of persons receiving services
- ✓ monitoring behavioral development programs in which persons with intellectual and developmental disabilities are involved
- ✓ monitoring the use of psychotropic medication by persons with intellectual and developmental disabilities



- ✓ reviewing investigations of allegations of mistreatment of persons with intellectual and developmental disabilities who are receiving services or support.

Medication Administration Record (MAR): means the chart maintained for each client which records the medication information required by 6 CCR 1011-1 Chapter 24

Qualified Instructor: a nurse, pharmacist, physician, or physician assistant with an active, unrestricted Colorado license.

Qualified Manager: a person who...

- ✓ Is the owner or operator of the facility or a supervisor designated by the owner or operator of the facility for the purpose of implementing sections 25-1.5-303, CRS, and has completed training in the administration of medication pursuant to section 25-1.5- 303, CRS,
- ✓ Or is a licensed nurse, licensed physician, or licensed pharmacist in the State of Colorado.

Qualified Medication Administration Personnel (QMAP): an individual who, in the state of Colorado, administers medication to patients while verifying and documenting the process. They follow steps and procedures for administering medication through the correct route and communicate these steps to the patient.

- ✓ Through CDPHE, a person who passed a competency evaluation administered by the Department before July 1, 2017, or has passed a competency evaluation administered by an approved training entity on or after July 1, 2017 and whose name appears on the Department's list of persons who have passed the requisite competency evaluation.
- ✓ This is not a certification or license.

### Procedures and Facility Requirements

- Wellspring will provide each Qualified Medication Administration Personnel (QMAP) with on-the-job training that focuses on the unique needs of the facility.
- Wellspring shall ensure that each QMAP hired on or after July 1, 2017, is adequately supervised until they have successfully completed the training.
- In accordance with requirements set forth by CDPHE, an employee with drug-related criminal backgrounds may be excluded from administering medications or may be subject to periodic monitoring to ensure safe and legal administration of medication.
- Wellspring shall require each QMAP, as a condition of employment or promotion to a position where the individual has access to medications, to sign a disclosure statement under penalty of perjury stating that he or she has never had a professional license to practice nursing, medicine, or pharmacy revoked in Colorado or any other state for reasons directly related to the administration of medications.
- Wellspring shall retain documentation of compliance with all 6 CCR 1011-1-24 rules.



## Training

When a Wellspring employee is to provide support or monitoring to a STAR in the administration of medication, or the filling of medication reminder systems, the employee will be required to participate in training and pass a competency evaluation provided by an approved training entity, and in accordance with standards defined in 6 CCR 1011-1-24-6. Wellspring will contract with approved training entities on an ongoing basis to ensure that employees are trained to meet the needs of STARS in its' programs. [QMAP Approved Training Entity List](#)

- Medications may only be administered by employees who have been trained in accordance with requirements set forth by the Colorado Department of Public Health and Environment (CDPHE).
- Volunteers will not be permitted to assist in medication administration.
- An approved Medication Administration Program will be completed within the first ninety (90) days of hire for those required.
  - Employees who are required to complete the training will be determined by Wellspring Community.
- If an employee has received training through another Program Approved Service Agency, completing the training again will not be required. However, face-to-face competency will be required in the new setting where the employee will be supporting the administration of medications. This will be completed by the Wellspring Compliance and Training Coordinator.
- Retraining may be required in response to repeated medication errors or as corrective action to an incident(s) involving medications. This may occur on an individual or company wide basis. Training may also recur on an ongoing basis, if determined necessary by Wellspring.
- The competency evaluation shall include written and practical skills testing and be administered by a qualified instructor who shall document each student's success with the competencies. Wellspring will maintain a copy of this documentation.
- QMAPs shall not administer medication through a gastrostomy tube or administer insulin unless specifically authorized to do so pursuant to rules adopted by the Department of Health Care Policy and Financing or the Department of Human Services.
- A QMAP shall not administer epinephrine injections unless the QMAP:
  - Has been directed to do so by a 911 emergency call operator as an urgent first aid measure, or
  - Has completed an anaphylaxis training program conducted by a nationally recognized organization and is authorized to use an epinephrine injector pursuant to section 25-47-103, C.R.S.

### Training Content will Include at Minimum:

1. The scope of service of a QMAP including, but not limited to:
  - a. Authorized settings and requirements,
  - b. Medication restrictions,
  - c. Roles, responsibilities, and cautions,



- d. Seven rights of medication administration,
  - e. Routes and forms of acceptable medication administration,
  - f. Reading, understanding, and validating medication orders, and
  - g. Expiration and refill dates.
2. The uses and forms of drugs including but not limited to:
    - a. The purpose of prescribed medications.
    - b. Controlled substance classification and accountability.
    - c. Medication effects including therapeutic, side, and adverse effects.
    - d. When, where, and how to properly navigate appropriate medication reference resources.
  3. Medication administration records (MARs) including, but not limited to:
    - a. Medication timing options (specified vs. time window), and
    - b. Rules and practice for documenting administration of medication to resident or client.
  4. Communication and interpersonal skills for addressing unique needs and behaviors of individuals who are elderly, have impaired physical capacity, impaired cognitive ability, behavioral issues, dementia and/or Alzheimer's.
  5. Infection control.
  6. Safety and emergency procedures
  7. Drug diversion awareness.
  8. Preventing and reporting abuse, neglect and misappropriation of resident or client property.
  9. Medication administration procedures including, but not limited to:
    - a. Administering, monitoring and self-administration,
    - b. Administering PRN medications in accordance with scope of practice,
    - c. Standards, precautions, and safe practice,
    - d. Preparing or altering medication for administration in accordance with manufacturer's instructions and authorized practitioner's orders,
    - e. Counting, administering, and documenting controlled substances,
    - f. Proper documentation of medication administration,
    - g. Determining, documenting, and reporting medication errors,
    - h. Medication storage and disposal, and
    - i. Filling and administration of medication reminder boxes and day/trip packs.

### Self-Administration

A person who self-administers medication is personally responsible for medication administration. Wellspring Community shall be responsible for observing or documenting the self-administration of medication.

Compliance with the requirements for the training of unlicensed persons in medication administration pursuant to this section is not required when persons being cared for are self-administering.



The Wellspring STAR Medication Assessment will be utilized to assess each STAR's level of independence and support needs to administer medications consistent with their abilities.

- The STAR will be assessed on independence in medication administration by the Wellspring Compliance Coordinator, or a Qualified Manager.
- STARS may only self-administer medication during their time in program when all areas of the medication assessment show independence.
- If the STAR receives services from an HCBS-DD residential services provider, Wellspring will request the STAR's medication assessment for independence from that provider to ensure consistency. The Wellspring assessment will not be completed if provided by the residential services provider.
  - If there is no assessment from the residential services provider, Wellspring Community will conduct their own assessment.
- Within the self-assessment, Wellspring will ensure STARS designated to self-administer medications can identify at minimum but not limited to...
  - The correct medication
  - Time for medication
  - Dosage
  - Be able to record when medication(s) was taken.
  - Be able to dispose of discontinued medications properly. Discontinued drugs, outdated drugs, and containers with worn, illegible or missing label should be given back to the individual and any necessary support provided by the agency to help ensure proper disposal, unless the individual gives consent for the agency to dispose of these medications.
- Wellspring will ensure that a STAR who self-administers medication is monitored while taking medication at a minimum of once each quarter.
  - The Wellspring Compliance Coordinator or a Qualified Manager will complete the monitoring.
    - The monitoring will include determination that the STAR is taking the correct medications, at the correct time, with the correct dosage, and correctly documenting what medication(s) were taken.
    - A record of this monitoring will be maintained in the STAR's main record.
- Concerns and errors in medication for any STAR who self-administers medication will be documented in an incident report.

### Use of Medications to Support Behaviors (Psychotropic Medication)

- Psychotropic medications may only be used for a psychiatric diagnosis.
- The diagnosis is to be made as the result of a psychiatric evaluation.
- Psychotropic medication may not be prescribed or given on a PRN/as needed basis.
- The dosage prescribed should be the minimum effective dose and allow for gradual reduction or discontinuation, as appropriate.



- Those who will support a STAR in the administration of the psychotropic medication shall be made aware of any potential side effects of the medication.
  - Wellspring staff will document any noted side effects and make the STAR's family or residential services provider aware of side effects noted.
- Prior to the administration of psychotropic medication:
  - Wellspring will obtain a copy of the STAR's latest comprehensive review of the STAR's life situation completed by the members of the interdisciplinary team, if applicable
  - An informed consent must be obtained from the STAR or her/his guardian (a copy may be obtained from the residential services provider)
  - An individual service and support plan (ISSP) is to be created to address how the STAR will be supported to maintain stability or how they will be supported in the event of a crisis based on the diagnosis and medication prescribed
  - Wellspring may be requested to submit information to the Human Rights Committee (HRC) regarding those behaviors for which the psychotropic medication is prescribed.

#### Medication Administration Record (MAR)

- A record of all medication administered to a STAR by an employee will be recorded on a MAR at the time the medication is administered.
- Employees are to ensure the MAR information matches the medication order and the labeling for the medication.
  - This includes:
    - name of the STAR
    - name of the medication
    - dosage
    - time the dosage is to be taken
    - route of the medication
- If a controlled substance is administered, it is to be recorded both on the MAR, as well as a controlled substance count sheet.
- Over the counter medications administered to the STAR are to also be recorded on the MAR.
  - The record will include:
    - the medication administered
    - the symptoms requiring the medication
    - the amount of the medication given
    - the effect the medication had for the STAR.
- Medication records will be reviewed monthly by the Wellspring Compliance Coordinator or a Qualified Manager to ensure medications are provided in accordance with orders.
- The drug regimen of each person receiving services on prescription medication shall be reviewed and evaluated by a licensed physician no less often than annually and more frequently if recommended by the physician or required by law.



## Medication Procurement

Only medications prescribed by the STAR's primary health care provider may be administered to the STAR, including both prescription and over-the-counter medications.

- Wellspring may not support a STAR in medication administration when a prescription is not available.
- STARS, the STAR's family, or the STAR's residential program (when applicable) will be required to provide medication orders to support the medications being taken or administered while attending Wellspring programs.
- Should a STAR return to program after an inpatient hospitalization, new orders from an authorized practitioner shall be obtained and followed.

## Medication Labeling

- All medication containers are to be labeled with
  - The STAR's full name
  - The name of the medication
  - The dosage
  - The route of the medication
  - The time administered
  - An expiration date
- Labeling of medications must match exactly the prescription or order for the medication and the MAR
- Medication that has a specific expiration date shall not be administered after that date.
- Any errors in labeling, or labels which do not match orders, or the MAR are to be reported immediately to the Wellspring Compliance Coordinator or a Qualified Manager.
- Medications that do not match labels or orders will not be administered to a STAR until corrected. The Wellspring Compliance Coordinator or a Qualified Manager will contact a STAR's pharmacy, family, or residential program, as applicable, to address mismatched labels or orders.

## Medication Storage

Wellspring will ensure that all medications brought to program by STARS are stored in a safe, secure, and clean environment.

- Medications are to be stored in a locking cabinet during hours when STARS are attending program at a facility-based location.
- When medications are needed while STARS attend programs in the community, Wellspring utilizes a locking bag for storage and security.
- Medications are to be stored away from food items, cleaning supplies or other contaminants.
- Medications are to be stored under the right conditions for light, temperature, and humidity as instructed by the STAR's pharmacy.



- If a medication is to be stored in the refrigerator, a sealed container will be used to separate the medication from food items. The container will be clearly marked as medication with the STAR's name, name and dosage of medication, and time of day the medication will be administered.
- Medications classified as *controlled substances* (Schedule II, III, IV, V) are to be stored in a locking container separate from other medications.
  - Access to these medications will only be available to employees who have completed the required and approved medication administration program training.
- STARS, who are determined by an assessment to be independent in administration of medication, may keep medication with themselves during the time attending program, or may choose to have medications locked along with other STARS' medications.
- STARS who have been assessed and determined to need assistance in the administration of medication will be required to provide medication to Wellspring staff for proper storage during time in program.
- Storage of medications will be reviewed on an ongoing basis by the Qualified Manager to determine if modifications are needed.
- All controlled substances shall be stored under double lock, counted, and signed for at the end of every shift in the presence of either two (2) QMAPS or a QMAP and a Qualified Manager.
  - If the above procedure is not possible, the QMAP going off-duty shall count and sign for the controlled substances and the next on-duty QMAP shall verify the count and sign.
  - If the count cannot be verified, the discrepancy shall be immediately reported to Wellspring's Program Director or Executive Director.

### Disposal of Medications

- Medications which have expired, are no longer needed by the STAR, have been contaminated or damaged, or are in containers that are no longer legible shall be destroyed immediately.
- For all medications managed by a facility, there shall be documentation that discontinued, outdated, or expired medications are promptly disposed of by the facility. The resident, client, or legal representative will sign a consent agreeing to this disposal option OR will agree to come and physically pickup any discontinued, outdated, or expired medications to dispose of themselves.
- The disposal of medications will be documented in the STAR's MAR record.

### Medication Errors and Refusals

- When an error has occurred in medication administration, which may include:
  - A missed or late dose
  - Incorrect medication or dosage
  - Medication given to the wrong STAR

An incident report will be written and routed according to Wellspring's Incident Report Policy and Procedures.



- The incident report will include any noted effects of the error and what measures were taken to address the error and the effects. This should include:
  - Who was contacted
  - If the medication was taken at a later time
  - Medical attention needed, if applicable.
- If the error requires emergency medical attention, or meets other criteria for a medical emergency, a Critical Incident will be routed to the STAR's Case Management Agency in accordance with Wellspring's policies and procedures.
- When a STAR refuses medication, the refusal will be recorded on the MAR.
  - An incident report will be completed for the refusal and routed in accordance with Wellspring's Incident Report Policy.
  - If the STAR continues to refuse to take medications (more than one day), the STAR's family or residential services provider will be requested to consult with the STAR's primary health care provider for needed action.