



## Medication Management Policy and Procedure Checklist

### Purpose and Intent of §483.35 and §483.45(d) for Medication Management

The purpose of the facility Medication Management Policy is to develop guidelines regarding expectations in the nursing home to develop and implement a solid system to ensure medication management procedures are in place, only authorized persons will administer medications, personnel administering medications have the skills and competencies to assure resident safety and to attain and/or maintain the highest practicable physical, mental, and psychosocial well-being of each resident. Medication management is based in the care process and includes recognition or identification of the problem/need, assessment, diagnosis/cause identification, management/treatment, monitoring, and revising interventions, as warranted as well as documenting medication management steps. The attending physician plays a key leadership role in medication management by developing, monitoring, and modifying the medication regimen in conjunction with residents, their families, and/or representative(s) and other professionals and direct care staff (the IDT).

To assure that the individual facility has followed all the required steps for the development and implementation of a comprehensive Medication Management policy in accordance to the new Requirements of Participation (RoP), the following checklist captures specific action items for successful completion. The left column represents the actual Requirements of Participation (RoP) language and the right column indicates specific leadership strategies for successful completion and implementation of the revised RoP. When preparing updated policies and procedures, it is recommended to include actual RoP language as applicable.

### Suggested Checklist Program and Policy and Procedure

Regulation	Recommended Actions
<p><b>§483.35 Nursing Services (F726):</b> The facility must have sufficient nursing staff with the appropriate competencies and skills sets to provide nursing and related services to assure resident safety and attain or maintain the highest practicable physical, mental, and psychosocial well-being of each resident, as determined by resident assessments and individual plans of care and considering the number, acuity and diagnoses of the</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Review, develop and/or implement the Medication Management Policy and Procedure</li> <li><input type="checkbox"/> Educate Licensed Nurses and non-licensed personnel who administer medications (in accordance with State law) about the Medication Management Policy and Procedure</li> </ul>



<p>facility’s resident population in accordance with the facility assessment required at §483.70(e).</p> <p><b>§483.35(a)(3)</b> The facility must ensure that licensed nurses have the specific competencies and skill sets necessary to care for residents’ needs, as identified through resident assessments, and described in the plan of care.</p> <p>Competency in skills and techniques necessary to care for residents’ needs includes but is not limited to competencies in areas such as;</p> <ul style="list-style-type: none"> <li>• Resident Rights;</li> <li>• Person centered care;</li> <li>• Communication;</li> <li>• Basic nursing skills;</li> <li>• Basic restorative services;</li> <li>• Skin and wound care;</li> <li>• <b>Medication management;</b></li> <li>• Pain management;</li> <li>• Infection control;</li> <li>• Identification of changes in condition;</li> <li>• Cultural competency.</li> </ul>	<p>and their role in development and implementation of interventions.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Conduct updated training for nursing leaders about supervising and monitoring for compliance with the Medication Management Policy and Procedure</li> <li><input type="checkbox"/> Conduct competency evaluations for licensed nurses and non-licensed personnel who administer medications (in accordance with State law)</li> <li><input type="checkbox"/> Review the Medication Management Policy with the Medical Director and Pharmacy Consultant in conjunction with the Quarterly Quality Assurance Committee meeting</li> </ul>
<p><b>F757 §483.45(d) Unnecessary Drugs—General.</b> Each resident’s drug regimen must be free from unnecessary drugs.</p> <p><b>MEDICATION MANAGEMENT</b></p> <p>Medication management is based in the care process and includes recognition or identification of the problem/need, assessment, diagnosis/cause identification, management/treatment, monitoring, and revising interventions, as warranted as well as documenting medication management steps. The attending physician plays a key leadership role in medication management by developing, monitoring, and modifying the medication regimen in conjunction with residents, their families, and/or representative(s) and other professionals and direct care staff (the IDT).</p> <p>The regulations associated with medication management include consideration of:</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Review, develop and/or implement policy as it relates to the Medication Management Program</li> <li><input type="checkbox"/> Assure that the policy contains the essential components which includes the recognition or identification of the problem/need (indication for use), assessment, diagnosis/cause identification, management/treatment, monitoring and revising interventions as warranted as well as documenting medication management steps</li> <li><input type="checkbox"/> As part of the Medication Management process, facility is to assure documentation includes:</li> </ul>



<ul style="list-style-type: none"> <li>• Indication and clinical need for medication;</li> <li>• Dose (including duplicate therapy);</li> <li>• Duration;</li> <li>• Adequate monitoring for efficacy and adverse consequences; and</li> <li>• Preventing, identifying, and responding to adverse consequences.</li> </ul> <p>With regard to psychotropic medications, the regulations additionally require:</p> <ul style="list-style-type: none"> <li>• Giving psychotropic medications only when necessary to treat a specific diagnosed and documented condition;</li> <li>• Implementing GDR and other non-pharmacologic interventions for residents who receive psychotropic medications, unless contraindicated; and</li> <li>• Limiting the timeframe for PRN psychotropic medications, which are not antipsychotic medications, to 14 days, unless a longer timeframe is deemed appropriate by the attending physician or the prescribing practitioner.</li> <li>• Limiting PRN psychotropic medications, which are antipsychotic medications, to 14 days and not entering a new order without first evaluating the resident.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Person-Centered, non-pharmacological approaches as necessary</li> <li><input type="checkbox"/> Involvement of the resident/resident representative in the medication management process</li> <li><input type="checkbox"/> Selection of medications based on assessing risks and benefit,</li> <li><input type="checkbox"/> Evaluation of resident’s physical, behavioral, mental and psychosocial signs and symptoms</li> <li><input type="checkbox"/> Selection and use of the medication is appropriate dose and duration</li> <li><input type="checkbox"/> Monitoring for efficacy and adverse consequences</li> <li><input type="checkbox"/> Resident Choice</li> <li><input type="checkbox"/> Advance Directives</li> </ul>
<p><b>F755</b> <b>§483.45 Pharmacy Services</b> The facility must provide routine and emergency drugs and biologicals to its residents, or obtain them under an agreement described in §483.70(g). The facility may permit unlicensed personnel to administer drugs if State law permits, but only under the general supervision of a licensed nurse. <b>§483.45(a) Procedures.</b> A facility must provide pharmaceutical services (including procedures that assure the accurate acquiring, receiving, dispensing, and administering of all drugs and biologicals) to meet the needs of each resident. Intent:</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Review, develop and/or implement the Medication Management Policy and Procedure including Medication Administration</li> <li><input type="checkbox"/> Assure that policy contains the necessary components of a medication management program such as:             <ul style="list-style-type: none"> <li><input type="checkbox"/> Medication Administration</li> <li><input type="checkbox"/> Availability of Medication in emergency supply</li> <li><input type="checkbox"/> Process for timely ordering and reordering</li> <li><input type="checkbox"/> Acquisition of Medications</li> </ul> </li> </ul>



<ul style="list-style-type: none"><li>• In order to meet the needs of each resident, the facility accurately and safely provides or obtains pharmaceutical services, including the provision of routine and emergency medications and biologicals, and the services of a licensed pharmacist;</li><li>• The facility utilizes only persons authorized by state or local, regulation, or other guidance to administer medications during the course of employment by a facility;</li><li>• The licensed pharmacist collaborates with facility leadership and staff to coordinate pharmaceutical services within the facility, guide development and evaluation of pharmaceutical services procedures, and help the facility identify, evaluate, and resolve pharmaceutical concerns which affect resident care, medical care or quality of life</li><li>• The facility, in coordination with the licensed pharmacist, provides for:<ul style="list-style-type: none"><li>o A system of medication records that enables periodic accurate reconciliation and accounting for all controlled medications;</li><li>o Prompt identification of loss or potential diversion of controlled medications; and</li><li>o Determination of the extent of loss or potential diversion of controlled medications</li></ul></li></ul>	<ul style="list-style-type: none"><li><input type="checkbox"/> Receiving Medications</li><li><input type="checkbox"/> Reporting Errors</li><li><input type="checkbox"/> Documentation</li><li><input type="checkbox"/> Disposition of Medications</li><li><input type="checkbox"/> Controlled Medications</li><li><input type="checkbox"/> Educate Licensed Nurses and non-licensed personnel who administer medications (in accordance with State law) about the Medication Management Policy and Procedures and their role in development and implementation of interventions.</li><li><input type="checkbox"/> Conduct updated training for nursing leaders about supervising and monitoring for compliance with the Medication Management Policy and Procedures</li><li><input type="checkbox"/> Conduct competency evaluations for licensed nurses and non-licensed personnel who administer medications (in accordance with State law)</li><li><input type="checkbox"/> Review the Medication Management Policy and Procedures with the Medical Director and Pharmacy Consultant in conjunction with the Quarterly Quality Assurance Committee meeting</li></ul>
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The below areas serve as a cross reference for facility leaders to conduct addition policy and procedure review across departments to incorporate the changes set forth in **F726 Competency and F758 Unnecessary Drugs as it relates to Medication Management**

This listing is not all encompassing however should serve as a resource for leaders as they update their internal policies, procedures and operational processes.

Cross Reference: (additional areas for review)

- CMS Regulations
- State and Local Regulations
- Employee Orientation
- Annual Training Requirements
- Medical Director
- Psychotropic Medications
- Pharmacy Services
- Resident Abuse (related to diversion)
- Quality Assurance and Performance Improvement
- Staff Training and Education

## References

CMS State Operations Manual, Appendix PP – Guidance to Surveyors for Long Term Care Facilities:

- <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Downloads/Advance-Appendix-PP-Including-Phase-2-.pdf>