

# COMPLIANCE CUE

F755

Pharmacy Services, Drug Processing Procedures, Pharmacist Duties, and Record Maintenance

## BACKGROUND

F755 of the CMS State Operations Manual Appendix PP provides guidance to Long Term Care Facility (LTCF) surveyors regarding **pharmacy services, drug processing procedures, pharmacist duties, and drug record maintenance**, as integral parts of care for managing the complex medication regimens of nursing home residents.

## REQUIREMENTS

§483.45 **Pharmacy Services:** The facility must provide routine and emergency drugs and biologicals to its residents...

- a. **Procedures.** 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.
- b. **Service Consultation.** The facility must employ or obtain the services of a **licensed pharmacist** who:
  1. **Provides consultation** on all aspects of the provision of pharmacy services in the facility;
  2. **Establishes a system of records** of receipt and disposition of all controlled drugs in sufficient detail to enable an accurate reconciliation; and,
  3. **Determines that drug records are in order** and that an account of all controlled drugs is maintained and periodically reconciled.

## KEY QUESTIONS FOR SURVEYORS

- Did the facility provide medications and/or biologicals and pharmaceutical services to meet the needs of the resident?
- Did the facility 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?
- Are all medications and biologicals stored and labeled properly (medication rooms, carts, boxes, refrigerators)?
- Does the facility have a system to account for the receipt, usage, disposition, and reconciliation of all controlled medications?

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## KEYS TO COMPLIANCE

THIS ENCOMPASSING FTAG MAY BE CITED FOR NONCOMPLIANCE WITH A NUMBER OF REGULATIONS. TO IMPROVE COMPLIANCE:

- I. Provide **routine** and **emergency** drug products in a **consistent** and **timely** manner for each resident's needs.
  - Develop procedures for staff responsible for medication administration to:
  - Ensure residents have sufficient supplies of their prescribed medications;
  - Ensure timely ordering and reordering of medications;
  - Monitor the delivery and receipt of ordered medications; and,
  - Determine the appropriate action if a resident's medication becomes unavailable for administration (e.g., contacting the prescriber or pharmacist).
- II. Use only authorized persons to administer medications (per applicable laws and regulations).
  - The facility may permit unlicensed personnel to administer drugs if state law permits, but only under the general supervision of a licensed nurse.
- III. Maintain strategic on-site supply of select medications for emergency or after-hours use (per applicable laws and regulations).
  - Consult pharmacy to determine appropriate drug selection and quantities for these on-hand products.
- IV. Establish medication acquisition process with pharmacy to avoid medication delays, especially 'first-dose' delays for critical medications, considering factors such as:
  - Availability of medications to enable continuity of care for new admits;
  - Resident condition (condition severity/instability/changes, resident discomfort, risk factors, signs and symptoms, and the potential impact of any delay in acquiring the medications);
  - Time sensitivity of medications, such as antibiotics or analgesics;
  - Availability of medications in emergency supply, if applicable; and,
  - Ordered start time/date for a medication.
- V. Utilize pharmacist to provide as-needed consultation on necessary aspects of pharmacy services in the facility.
  - Licensed pharmacist to collaborate 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.

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### VI. Leverage pharmacist expertise to:

- Provide insight regarding medication records and reconciliation for controlled medications;
- Provide prompt identification of loss or potential diversion of controlled medications; and
- Provide determination of the extent of loss or potential diversion of controlled medications.

### VII. Employ drug disposal systems that demonstrate the ability to stop accidental exposure and intentional diversion.

### VIII. Adopt strategies to minimize diversion risk, such as ensuring that destruction of highly potent or frequently diverted meds (e.g., fentanyl patches) are recorded in writing, attested to, and witnessed by $\geq 2$ qualified and designated facility personnel.

## STEPS TO FACILITY COMPLIANCE

- ✓ Develop and regularly review policies and procedures for alignment with these requirements per the CMS State Operations Manual and other applicable rules and regulations.
- ✓ Lead investigation into suspected diversion of controlled medications, employing appropriate risk management strategies and enacting corrective actions as issues are identified.
- ✓ Utilize the consultant pharmacist to offer support in the areas of pharmacy services, drug processing procedures, pharmacist duties, and drug record maintenance.

## HOW PHARMERICA CAN HELP

- ✓ Provide as-needed consultation services for all requested aspects of pharmacy services in facility (e.g., MRR, QAPI, IPC, etc.), subject to facility request(s) and contractual agreement.
- ✓ Perform regular internal audits of medication storage, administration, and destruction to identify potential controlled medication diversion.
- ✓ Provide guidance and direction to support facility leadership in investigating suspected diversion.