

A Systematic Approach to Consultant Pharmacy Services

Introduction to Regulatory Requirements with
Related Policies and Procedures

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POLICY AND PROCEDURES

Policy and Procedure Manual In the Nursing Home

1. What is a policy and procedure manual?

The P&P manual is a facility specific document that spells out all facility policies and procedures involving the ordering, storage, administration, documentation and distribution of medications in the facility

2. Who is responsible for developing the manual?

The Consultant Pharmacist oversees the policies and procedures in the facility but these policies are reviewed and approved by the facility's Quality Assessment and Assurance Committee. The vendor Pharmacy is often the party that actually prepares, prints and distributes policies within the facility. Therefore, the Consultant Pharmacist must work closely with the vendor pharmacy and the QAA committee to ensure that policies truly reflect policies in use at the facility.

3. Why are they necessary?

The policy and procedure manual establishes standards of practice in the facility and should standardize these procedures for all nursing staff. This manual is an important tool for training new nursing personnel and agency nurses that have questions about procedures within the facility

4. What is the approval process for implementing a new policy?

A new policy (or a change in current policy) should be discussed with the Director of Nursing, the Charge nurses, the vendor pharmacy and possibly the Medical Director before the policy is implemented. Once there is consensus on the policy either the vendor pharmacy or the Consultant will prepare the final document. This new or changed policy is usually presented to the QAA committee for final approval however the facility administration may elect to implement a policy change immediately. Nursing staff should always be notified (either by memo or inservice) of policy changes prior to the implementation date.

5. How often should policies be reviewed?

Policies should be reviewed frequently to ensure that they reflect actual practice within the facility. Regulations require that the policy and procedure manual be reviewed at a minimum once each year and further requires that key staff sign off on their review. (See next page for sample of how this is accomplished)

6. As a minimum what policies should be included?

See sample index of a nursing home policy and procedure (later in this chapter)

SAMPLE POLICY & METHODS

Authority of Policies and Methods

The Quality Assessment & Assurance Committee of SAMPLE Nursing Home is responsible for establishing pharmacy policies in this facility and has reviewed and approved the enclosed policies and methods

Administrator

Date

Medical Director

Director of Nursing

Consultant Pharmacist

(Note: This sample cover sheet will be signed at least annually by each of the persons listed above. This signature documents that the policies have been reviewed. Most policy and procedure manuals also have a "Review Date" on each page. These review dates should also be updated at least annually even if all policies remain the same.)

SAMPLE

**MODEL PHARMACY POLICY & PROCEDURE MANUAL
TABLE OF CONTENTS**

<u>Subject</u>	<u>Page</u>
Policy and Procedure Authorization	i
Pharmaceutical Services Subcommittee Roster	ii
Table of Contents	iii
I. POLICIES AND PROCEDURES	
A. Organizational Aspects	
Quality Assessment and Assurance Committee	2
Pharmaceutical Services Subcommittee	5
Provider Pharmacy - Requirements	7
Consultant Pharmacist Services Provider - Requirements	9
Monthly Report of Drug Regimen Review and Nursing Documentation	12
Quarterly Report	14
Infusion Therapy Products Provider	15
Arrangements with Noncontract Pharmacy	17
B. Medication Orders	
Prescriber Medication Orders	22
Elements of the Medication Order	22
Documentation of the Medication Order	22
Four Types of Medication Orders	23
Scheduling of New Medication Orders	25
Orders from Physician Assistants and Nurse Practitioners	25

Stop Orders	26
Standing Orders	28
C. Medication Ordering and Receipt	
Pharmacy Hours and Delivery Schedule	30
Ordering and Receiving Medications from Pharmacy	31
Controlled Medication Ordering and Receipt	34
Transmitting Pharmacy Orders Via Facsimile Machine	36
Emergency Pharmacy Service	37
Multiple Source Drug Products	38
House-supplied (Floor Stock) Medications	40
Medication Information	41
Emergency Medications	
Emergency Medication Kit and Antibiotic Stat Kit	42
Emergency Infusion Therapy Products & Supplies	44
Preparation of Emergency or Unstable Infusion	
Therapy Products	46
Controlled Substances Emergency Supply	47
Ordering and Receiving Medications From Non-Contract Pharmacy	49
Medications Brought to Facility by Resident or Family	52
Infusion Therapy Products Labels	56
Medication Labels and Packaging	58
D. Medication Storage	
Medication Storage in Facility	60
Infusion Therapy Solution Storage	62
E. Medication Administration - General Information	

Equipment and Supplies for Administering Medication	64
General Guidelines for Medication Administration	65
Vials and Ampules of Parenteral Medications	70
Infusion Therapy Product Administration	71
Controlled Medications - Administration	72
Irrigation Solutions	75
Enteral Tube Medication Administration	76
Self-Administration of Medications	78
F. Medication Administration - Specific Procedures	
Oral Medications	82
Sublingual Medications	85
Inhalations, Oral and Nasal	87
Eye (Ophthalmic) Drops	89
Eye (Ophthalmic) Ointments	91
Ear (Otic) Drops	93
Nose Drops	95
Rectal Suppositories	97
Vaginal Medications	99
Enteral Tube Medication Administration	101
Parenteral Medication Administration	
Reconstitution of Medication for Parenteral Use	104
Intramuscular (IM) Administration	106
Subcutaneous (SC) Administration	109
Infusion Therapy (IV) Administration	112
Insulin Injection Administration	114
Transdermal Drug Delivery System Application (Patch)	117

Pharmacy Policy & Procedure Manual
Table of Contents (continued)

<u>Subject</u>	<u>Page</u>
G. Disposal Of Medications and Medication - related Equipment	
Controlled Medications Disposal and Destruction	120
Discharge Medications	121
Discontinued Medications	122
Returning Medications to Pharmacy	123
Destroying Medications	124
Syringe and Needle Disposal	125
H. Miscellaneous Special Situations	
Out-On-Pass Medications	127
Medication Incidents	129
Adverse Drug Reactions	129
Investigational Drugs	131
Medications Not Covered by Third Party Payers	133
Patient Package Inserts	134
Medications Dispensed by Physicians	135
Drug Product Problem Reporting	136
Bedside Storage of Medications	137
Drug Product Recalls	139

I.	Medication Monitoring Guidelines	
	Automatic Orders for Medication Therapy Monitoring	141
	Monitoring of Psychoactive Drugs	
	Monitoring of Hypnotics	144
	Monitoring of Sedatives	146
	Monitoring of Antidepressants	148
	Monitoring of Antipsychotics	149
	Assessment of Pharmacological Behavior Modification	152
II.	QUALITY ASSURANCE MONITORING	
	A. QA of Medication Storage	155
	B. QA of Medication Administration	157
	C. QA of Medication Administration Records	159
	D. QA of Drug Regimen Review Documentation	161
	E. QA of Ordering and Receipt of Medications	163
	F. QA of Medication Delivery by Provider Pharmacy	165
	G. QA of Medication Labeling	166
III.	APPENDICES - FORMS AND DOCUMENTS	
	1. Departmental QA Report	169
	2. QAA Problem Tracking Form	170
	3. Pharmaceutical Services Contract	171
	4. Consultant Pharmacist Contract	174
	5. Medication Room/Cart Inspection Report	177
	6. MAR/Medication Order Review	179
	7. Documentation Form for Consultant Pharmacist	
	Drug Regimen Review	180

8.	DRR Recommendations to Physician	181
9.	Nursing Documentation Findings Form	182
10.	Medication Pass Observation Worksheet	183
11.	Model Letter to MD Regarding DRR	184
12.	Physician's Order Sheet	186
13.	Telephone Order Sheet	187
14.	Physician's Order Summary Sheet	188
15.	Pharmacy Hours and Delivery Schedule	189
16.	Formulary for Physician Assistants and Nurse Practitioners	190
17.	Model Letter to MD regarding Stop Order Policy	191
18.	Medication Reorder/Order Change Form	192
19.	Pharmacy Delivery Receipt	193
20.	Standing Orders	194
21.	Model Letter to MD Regarding Standing Order Policy	196
22.	Schedules of Commonly Prescribed Controlled Medications	197
23.	Controlled Medications Accountability Record	198

SAMPLE

PROVIDER PHARMACY - REQUIREMENTS

POLICY Regular and reliable pharmaceutical service is available to provide residents with prescription and non-prescription medications and services, and related equipment and supplies. A written agreement with a provider pharmacy stipulates financial arrangements and the terms of the services provided.

PROCEDURES

- 1) The Facility maintains a written agreement with the provider pharmacy (Appendix 3), signed by the administrator and an authorized representative of the provide pharmacy.
- 2) The provider pharmacy is responsible for rendering the required service in accordance with local, state and federal laws and regulations, facility policies and procedures and community standards of practice.
- 3) The provider pharmacy agrees to perform the following pharmaceutical services including, but not limited to:
 - Assisting the facility, as necessary, in determining the appropriate equipment and packaging to meet the medication needs of the residents and the facility.
 - Accurately dispensing prescriptions based on authorized prescriber orders.
 - Providing medications packaged in accordance with the facility's needs and equipment requirements.
 - Supplying only USP and NF approved medications, biologicals and supplies, other than extemporaneously compounded medications or investigational new drugs.
 - Labeling all medications dispensed in accordance with all applicable laws.
 - Providing routine and timely pharmacy service (7) days per week and emergency pharmacy service 24 hours per day, seven days per week.
 - Maintaining a medication profile on each resident which includes all medications dispensed and facility provided information on the resident's age, diagnoses, weight, condition, medication allergies, diet and any other pertinent information.
 - Screening each new medication order for an appropriate indication or diagnosis; for drug interactions with other medications ordered for the resident; for duplication of therapy with other drugs in the same therapeutic class ordered for the resident; and for appropriate drug dose, interval and route of administration, based on resident and other pertinent variables. If diagnosis or indication is not available, notifying the nursing staff of the need to obtain the information from the prescriber prior to administering the drug.