



Policy Title: Medication and Treatment Discrepancies/Errors	Effective Date	04/01/2021
	Revision Date	
	Approval	3/24/2021

I. **Purpose:**

To clarify terms and disciplinary action based on the number of medication discrepancies/errors a staff member accrues during employment at PAI.

II. **Revision History**

Date	Revision Number	Change	Reference Section(s)

III. **Persons Affected:**

All PAI staff who pass medication.

IV. **Persons Responsible:**

PAI staff members who administer medication and/or treatment.

- Direct Support Professional (DSP)
- Lead Direct Support Professional (LDSP)
- Program Supervisor (PS)
- Program Director (PD)
- Registered Nurse (RN)
- Human Resources Manager (HRM)

V. **Definitions:**

- Medication Discrepancy:** Occurs when a medication or treatment is administered but not documented correctly. A discrepancy may include, but is not limited to scheduled medications, ordered treatments, tasks, community outing medications and treatments, and PRN medications. Documentation that is completed on an electronic or paper medication administration record, bubble/blister packs, medication envelopes, or medisets are all included in this policy.
- Medication Error:** Occurs when a physician's order is compromised. This includes but is not limited to the following: a medication, treatment, or task is administered by the wrong dosage, the wrong route, to the wrong person, or at the wrong time. If an omission of the medication, treatment, or task occurs; an incorrect medication, treatment or task is administered; a medication, treatment or task is administered without a current order.

VI. **Policy:**

Disciplinary actions will be based on the number of points a staff person accrues within a six-month period. For example, if a medication discrepancy/error occurs on April 10th, all discrepancies/errors a staff accrues between October 10th through April 10th will be counted towards the staff's total points.

Medication Discrepancy: One (1) point per participant, per medication pass.

Medication Error: Three (3) points per participant, per medication pass.

Performance Indicators:

1. A medication discrepancy/error report will be completed. The RN and PS and/or PD will review the report for each discrepancy/error.
2. At six (6) points, a verbal warning will be issued by the PS/PD and a test is given by the RN. The test is to be returned to the RN within 48-hours. More severe disciplinary action could occur based on the nature of the discrepancy/error and the employee's performance history.
3. At nine (9) points, a written warning will be issued by the PS/PD and the staff member will review the discrepancies/errors with the RN. The staff member will also complete a medication pass under the RN's observation within two-weeks. More severe disciplinary action could occur based on the nature of the discrepancy/error and the employee's performance history.
4. At 12 points, a second written warning will be issued by the PS/PD and a full review of medication administration, including documentation of skills will be completed within 2-weeks.
5. At 15 points, the staff member will be subject to further disciplinary action up to and including termination.

Information Pertinent to Policy:

1. Staff members are required to follow all physician's orders, nursing orders, and PAI policies and procedures whenever administering medication.
2. At any point, further disciplinary action may occur based on the nature of the discrepancy and/or error and the staff member's performance history. A history of repeated errors may be subject to possible termination and will be reviewed and determined in coordination with the RN (if applicable/necessary), PS, PD, and HRM.
3. At any point, if it is determined that a staff member does not comply with competency to safely administer medications or treatments, the RN may elect to suspend or terminate medication administration duties. Inability to pass medications may affect the staff member's ability to perform the minimum requirements of his/her job.
4. A maximum of one medication discrepancy/error report will be completed per participant medication pass.
5. If a medication is not administered for a reason that is beyond the control of the staff member (determined by the RN, PS, and/or PD), it will not be counted as a medication error.
6. All medication errors must be reported to the RN and PS/PD immediately. Notification of medication discrepancies will be reported as determined by the RN, PS, and/or PD. For ICF/MR homes, the RN, PS, or PD must notify the participant's physician of all medication errors within 24 business hours.
7. The PS/PD will track medication discrepancy and error patterns.
8. The PS/PD must submit the signed medication discrepancy/error report to the RN within 24 business hours.
9. A complicated medication discrepancy or error is subject to review/discipline by the RN, PS, and PD.
10. This policy is effective the first day an employee is certified in medication administration and is trained by the RN. Any discrepancy/error will be part of the staff member's permanent record.
11. In situations where medications are entered incorrectly in the medication system or in the medication sheets, the staff member entering the medication(s) incorrectly will receive a medication error and/or further disciplinary action based on the nature of the error and the staff member's performance history.

12. In instances where the information on the label of the medication does not match the information on the computer or medication sheet, staff members must contact the RN before administering the medication. Medication errors will occur if a staff member passes medication where the label does not match the record without corroboration or consultation.
13. Medication errors that result from a staff member accidentally signing off on medication they did not give will be charged to the staff member who accidentally signed off on the medication(s).
14. Staff members who give the last dose of a medication must check to see if there is an additional supply of that medication available for the next medication pass. If no medications are available for the next medication pass, staff must contact the participant's residence, or they will be charged with an error for any missed medications that result from failing to request more medication.
15. If a medication discrepancy/error occurs at another program location that is under the direction of another PS and/or PD, the discrepancy/error will be communicated to the staff person's direct supervisor by the next business day.

VII. **Forms:**

- Error Report
- Tracking Spreadsheet