

REQUEST FOR CLARIFICATION/INTERPRETATION

TO:	Name and Title: Jannis Conselyea, Bureau Chief	FROM:	Name and Title: Pam Rhodes, Director
	Organizational Unit: DDP Central Office		Organizational Unit: Achievements, Inc.
	Address: Helena, MT		Address: Libby, MT

1. TYPE OF REQUEST: Follow-up to Verbal Request - Date of Verbal Request: _____ Written Request

2. STATEMENT OF QUESTION OR ISSUE: The Board Of Nursing Administrative Rule 24.159.1604 under "TASKS WHICH MAY BE ROUTINELY ASSIGNED TO AN UNLICENSED PERSON IN ANY SETTING WHEN A NURSE-PATIENT RELATIONSHIP EXISTS".

- (h) under that rule states as permissible " assisting with the self-administration of medications where the following acts are used:
- (i) verbal suggestions, prompting, reminding, gesturing, or providing a written guide for selfadministering medications;
 - (ii) handing the prefilled, labeled medication holder, labeled unit dose container, syringe, or original marked, labeled container from the pharmacy to the patient;
 - (iii) opening the lid of the above referenced container for the patient;
 - (iv) guiding the hand of the patient to selfadminister medication;
 - (v) holding and assisting the patient in drinking fluid to assist in the swallowing of oral medications
 - (vi) assisting with removal of a medication from a container for residents with a physical disability which prevents independence in the act."

DDP Administrative Rule 37.34.114 under "CERTIFICATION OF PERSONS ASSISTING IN THE ADMINISTRATION OF MEDICATION" states that "(a) Assistance" means providing any degree of support or aid to an individual who independently performs at least one component of medication-taking behavior."

The 2009 "Health and Medication Administration Manual for Individuals with Developmental Disabilities" study guide and reference manual states on page 1 "This manual is designed to inform and train staff who assist and supervise in the selfadministration of medications by person with developmental disabilities", on page 4 states "Your rde as care giver is to assist the consumer with taking his/her medication. Your role is two fold. You are teaching or training the consumer to take his/her medication properly. Youare also responsible for the consumer's proper administration of medicationas prescribed". On page 12, information is provided regarding mixing medications with food. "To help a consumer more easily take a medication, it is sometimes necessary to mix that medication with food", and "The food the medication was mixed with must befinished at the time you are assisting with medication administration" is among the information found in that page. Page 27 indicates that staff"stay with the person while he/she takes medication", and page A19 of the glossary defines Assist as "to givesupport or aid in the self-administration of medication."

1. If an individual in services cannot physically assist in any component of taking their medications, other than to swallow the medication, does that act of swallowing their medication fall under the qualifier of independently performing at least one component of medication-taking behavior and remain in compliance with the Board of Nursing, DDP Administrative Rules, and the Health and Medication Administration Manual?
2. Staff are not to crush medications unless prescribed by the individual's health care professional. If a script is obtained permiting the crushing of medications, are certified staff permitted to crush the medication(s) in food and feed an individual their medication if the individual is not able to participate in any other act of feeding themselves other than to swallow the food that is placed in their mouth?
3. If a doctor has prescribed that nursing support is required to administer medications to someone who is physically unable to participate in any portion of taking their medication(s) other than to swallow what has been placed in their mouth, are staff permitted to feed said person their medication(s) (i.e. medication is placed in food, food is placed in person's mouth and individual swallows medication)?

ANSWER: (1) Yes, the act of swallowing meets the qualification of performing a component of medication administration. (2) Yes certified staff are permitted to crush medication in food and feed the medication to the individual if they are not able to do so, as long as there is a physicians order to crush the medication. (3) Yes, although a doctor has written a script for nursing support, direct care staff that are med certified may assist with medication, i.e. crushing medication and placing it in food and assisting with the spoon to the mouth for the individual to swallow.


 _____ Program Director
 Date: 8-26-10

<p>4: DISTRIBUTION:</p> <p>One Copy: _____ One Copy: _____ One Copy: _____</p> <p style="text-align: right;">Requestor Manual Coordinator Division Files</p>	<p>5: FOLLOW-UP:</p> <p><input type="checkbox"/> To be issued as Bulletin to: _____ (Division Administrator)</p> <p>Manual. Expected Date of Issuance: _____</p>
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