

 <p style="text-align: center;">County of Sacramento Department of Health and Human Services Division of Behavioral Health Services Policy and Procedure</p>	Policy Issuer (Unit/Program)	QM
	Policy Number	QM-00-06
	Effective Date	07-01-2013
	Revision Date	
Title: Medication Support Staff Electronic Documentation Requirements	Functional Area: Administration	
Approved By: (Signature on File) Signed version available upon request Kathy Aposhian, RN Program Manager, Quality Management Robert Hales, MD Medical Director, Division of Behavioral Health Services Glen Xiong, MD Medical Director, Mental Health Treatment Center Bob Horst, MD Medical Director, Child and Family Services		

BACKGROUND/CONTEXT:

In 2009, Sacramento County Behavioral Health Services (BHS) began implementation of the Electronic Health Record (EHR), Avatar Clinical Workstation and Order Connect (InfoScriber). In September, 2012, the phased EHR implementation began for all providers utilizing Avatar Clinical Work Station (CWS). Order Connect is the electronic prescribing application that provides functionality such as medication reconciliation tools to prevent medication errors.

DEFINITIONS:

Prescribers: Practitioners will be licensed to practice in the State of California as an Medical Doctor (MD), Doctor of Osteopathy (DO), Physician Assistant (PA), or Nurse Practitioner (NP).

Prescribing Agents/ Medication Support Staff: Practitioners will be licensed to practice in the State of California as a Registered Nurse (RN), Licensed Vocational Nurse (LVN), or Licensed Psychiatric Technician (PT). In exceptional circumstances, an agency staff may be authorized to perform limited duties as a medication support staff. The medication support staff typically dispense, administer, educate, and monitor side effects of medications under direct or indirect supervision of the prescriber. Medication Support Staff call in, fax or e-RX verbal or written prescriber orders and refill prescriptions on behalf of the prescriber.

Non-prescribers: Non-prescribers are staff with limited access to InfoScriber to enter information. They may enter information into Allergies and Non Infoscriber (Non-ISC) Prescriptions reported by the client. Non-prescribers will have no scope of practice to prescribe medications.

PURPOSE:

The purpose of this policy is to delineate the documentation responsibilities of the Prescribing Agents/Medication Support Staff as it relates to e-prescribing functionality. BHS utilizes Avatar/Order Connect. This policy applies to all electronic prescribing tools utilized by BHS contractors or equivalent prescribing standards.

DETAILS:

Policy:

It is the policy of the Division of Behavioral Health Services for prescribing agents/medication support staff to provide services within their scope of license and practice.

Procedure:

- A. Prescribing Agent/Medication Support Staff Documentation in Order Connect or Equivalent E-prescribing Tool.
 1. Medication Reconciliation Information
 - a. Allergy Information provided by the client will be recorded.
 - b. Non-ISC or prescription use not prescribed by agency including over the counter medications, and supplements will be recorded.
 2. Prescription Information
 - a. Verbal, written and/or prescription refills will be entered into Order Connect or equivalent e-prescribing tool.
 - b. Enter the correct medication ordered, correct dosage, schedule and administration route on behalf of the prescriber.
 - c. Enter any special instructions.
 - d. Enter the required start date for the medication and submit order.
 3. Finalizing Prescription
 - a. Review Order Confirmation to determine if information is accurate.
 - b. The correct prescriber, on whose behalf you are ordering, **must** be selected.
 - c. Proceed to complete the order Output by print, fax or e-RX.
 - i. Primary method is e-RX and every effort must be made to e-prescribe, whenever possible.
 - ii. Exception to e-RX would include Schedule II medications and pharmacies that are unable to receive e-RX at this time.
 - iii. Select "None" if the client was provided a paper prescription. The prescribed medication will display on the Current Medication Profile.
 - d. Medications ordered on behalf of the prescriber will display in the form of a widget on the home page of the prescriber. Widgets available are "My Last 7 Days Agent Prescriptions and "My Last 3 Days Agent Prescriptions".
- B. Medication Support Staff Progress Note: All Medication Support Staff work under the direction of a prescriber. A progress note is required to support their action as part of this service.
 1. Ordering verbal, written or refill medications on behalf of the prescriber.
 - a. Describe the type of order requested Example: Verbal order.
 - b. Name of prescriber Example: Dr. John Smith.
 - c. Level of consultation with prescriber. Consultation documentation must include a review of the medication name, dose, route and frequency to be ordered/refilled and a summary of the discussion between the prescriber and prescribing agent. The discussion may include a review of client compliance with the medication regime, current community level of functioning, and the date of the next scheduled medication support appointment.
 - d. Information provided to the client.
 2. All direct and collateral services provided to the client are documented.
 - a. Services provided face-to-face or by telephone, and may be with the client or significant support person.
 - b. Medication education (including discussing risks, benefits, and alternatives with the client or significant support persons).
 - c. Plan development related to the delivery of this service and/or to the status of the individual's community functioning.
 - d. Administering of oral and/or injectable psychiatric medications.

e. Dispensing “sample” or “compassionate care” medications per protocol.

C. Quality Improvement/Assurance and Monitoring:

1. Prescriber Reports: Prescribers will have the following Avatar reports to verify the actions taken by the medication support staff. Reports are visible to the prescriber at any date range interval (daily, weekly, monthly) to monitor all prescriptions written on their behalf. Report examples include:
 - a. OrderConnect Prescriber RX History
 - b. OrderConnect QM All RX History
 - c. OrderConnect QM Agent RX History
2. Monitoring: BHS Quality Management (QM) will monitor compliance with documentation standards on a monthly basis, as a function of the Utilization Review/Quality Assurance process. If the review demonstrates concerns regarding documentation, QM will contact the agency clinic manager and prescriber for follow up action.
3. Errors: Prescriber/prescribing agent indentifying any errors will alert their Medical Director and/or the QM Compliance Officer. Errors identified by QM or Prescriber/Prescriber Agent, will require a plan of correction implemented by the Agency Director and/or the Agency Medical Director and the involved medication support staff. In the event that the error occurred at another agency, the discovering Prescriber/Prescribing Agent will notify their Medical Director and/or QM Compliance Officer and submit a report to QM. The agency in which the error occurred will be notified by QM to submit a plan of correction.
 - a. Plan of Correction will be forwarded to QM Utilization Review for review and approval.
4. Medication Monitoring Activities: Select chart reviews will review medication progress notes and medications ordered on behalf of the prescriber.
 - a. Progress notes that do not support the level of consultation will be identified as out of compliance.
 - b. Lack of any medication-specific laboratory monitoring parameters ordered (in accordance with Medication Monitoring criteria) will be identified as out of compliance.
 - c. Chart Review reports will be sent to agency manager and medical directors for review and a plan of correction, when appropriate.
 - d. Chart Review Reports and out of compliance plan of correction will be reviewed by QM Program Manager

REFERENCE(S)/ATTACHMENTS:

- Title 9; 782.28, 782.29, 782.44
- 2013 Pharmacy Lawbook
- Business & Professions Code Chapter 9, Division 2

RELATED POLICIES:

- No. 07-02 Medication Support Services
- No. 07-03 Dispensing Sample Medications
- No. 07-04 Compassionate Care Pharmaceuticals
- No. 04-01 Site Certification

DISTRIBUTION:

Enter X	DL Name	Enter X	DL Name
X	Mental Health Staff		
X	Mental Health Treatment Center		
X	Adult Contract Providers		
X	Children's Contract Providers		
X	Alcohol and Drug Services		
	Specific grant/specialty resource		

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