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NOTICE

From: Department of Public Health, Medication Administration Program (MAP)

To: MAP Administrators and Coordinators

Date: September 15, 2021

Subject: COVID-19 – LOA Medication Supply Expansion – extension

The Drug Control Program (DCP) Notice dated April 1, 2020 and titled "COVID-19 – LOA Medication Supply Expansion" is set to expire on September 15, 2021. Department of Public Health (DPH) registered Medication Administration Program (MAP) Community Programs (Programs) continue to face challenges complying with MAP Policy 11 *Leave of Absence*, which details requirements for medication transfers, packaging and administration during a leave of absence (LOA).

In light of these continuing challenges and to provide further flexibility, DCP, in consultation with the Massachusetts Rehabilitation Commission (MRC), the Department and the Department of Mental Health (DMH), the Department of Developmental Services (DDS), and the Department of Children and Families (DCF), is authorizing Programs to continue to adhere to an alternative LOA process under the following circumstances until December 31, 2021.

For individuals who are "learning to self-administer," pursuant to MAP Policy 7, and are located at DMH independent supported apartments, outside of a Group Living Environment (GLE):

- As an exception to MAP Policy 11-1(b), MAP Certified staff may prepare up to a seven-day supply of the individual's medication in the manner outlined in MAP Policy 11-2 or in a medication organizer;
 - As an exception to MAP Policy 11-2(1)(a), a separate medication organizer for each individual medication is <u>not</u> required.
- At the time of administration, MAP Certified staff may provide a prompt to the individual by phone or other telehealth method;
- MAP Certified staff is responsible for verifying that medications were taken as directed at the time of each dose or by inspecting the returning supply, if any.

• Any medications remaining in a medication organizer at the time of the next re-packaging may not be returned to the Program but must be disposed of in accordance with MAP Policy 10-5.

For individuals who are temporarily relocated to an <u>unregistered</u> site or GLE:

- As an exception to MAP Policy 11-1(b), MAP Certified staff may prepare up to a 14-day supply of the individual's medication in the manner outlined in MAP Policy 11-2 or in a medication organizer.
 - As an exception to MAP Policy 11-2(1)(a), a separate medication organizer for each individual medication is <u>not</u> required.
- It is also authorized for MAP Certified staff to provide up to the remaining supply of the individual's blister packaged medications;
 - The supply of medication needed may not exceed the individual's current remaining supply;
 - If the period of the individual's relocation will exceed the remaining supply, the Program should prepare an additional transfer of packaged medications for the remainder of the LOA upon the Program's receipt of the individual's refilled orders.
- Once transferred to the relocation site, it is expected that any LOA medications will be administered by a person **legally authorized to administer medications** to the relocated individual, in accordance with M.G.L. c. 94C, § 9, *the Massachusetts Controlled Substances Act*, and 105 CMR 700, *Implementation of M.G.L. c. 94C*.
- If the individual returns to the MAP Registered site sooner than anticipated, medications can be accepted back into the Program only if they are stored in tamper resistant packaging (blister packaging).
 - In such cases, the contents of the blister pack must be verified by a licensed health care professional or pharmacy prior to accepting it back into the Program.
 - Bottles of pills or liquids cannot be returned to the Program and must be disposed of in accordance with MAP Policy 10-5.

MAP Certified staff must strictly adhere to MAP Policies on documentation of the chain of custody of the medications using medication transfer and transport documentation procedures typically used between Programs in accordance with MAP Policy 10-10, and for LOA, MAP Policy 11-3, including the completion of a transfer form upon transfer and return. Failure to do so may result in questions related to possible diversion of medications.

If you have any questions please contact your MRC, DDS, DMH or DCF MAP Coordinator for further guidance.