



The Commonwealth of Massachusetts

Executive Office of Health and Human Services

Department of Public Health

Bureau of Health Professions Licensure

Drug Control Program

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TO: Medication Administration Program Administrators and Registered Sites
FROM: David E. Johnson, Director, Drug Control Program
DATE: November 20, 2020
SUBJECT: MAP Policy 10-3 Controlled Substance Count

Please be advised that the Drug Control Program has amended MAP Policy 10-3 relative to Medication Security and Record Keeping for Schedules II-V. These amendments clarify the frequency of required two-person counts and the circumstances under which a one-person count is permissible.

The Final MAP Policy 10-3, as amended, and the redlined policy, showing amendments, are included on the next page as Attachment A.

Attachment A

Final MAP Policy 10-3 (redlined changes accepted):

1. Medication counts are to be conducted whenever control of the medication key is passed, including placement of the key into or removal from a lock box.
2. All such medication counts are to be conducted by two licensed and/or Certified staff persons, unless all of the below conditions are met, in which case, the required count may be conducted by a single licensed/Certified staff person coming on or going off assignment. Necessary conditions include the following:
 - a. A second licensed/Certified staff person is not scheduled to be on site when the responsibility of the control of the medication key needs to be passed, and
 - b. The required two-person count has been conducted within the preceding 24 hours.
3. After a single licensed/Certified staff person conducts a required medication count under the above conditions, the following steps must be undertaken:
 - a. The single licensed/Certified staff person must sign the *Countable Controlled Substance Book* and note that the count was conducted by a single person rather than two persons, as otherwise required, and
 - b. At the first practical opportunity, and no later than 24 hours after the last two-person count was conducted, a required two-person count must be conducted.

Amended MAP Policy 10-3 (redlined changes):

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1. Medication counts are to be conducted whenever control of the medication key is passed, **including placement of the key into or removal from a lock box.** ~~(i.e., at the start and end of each shift/assignment).~~
2. ~~DPH recognizes that there are some situations where~~ **All such medication counts are to be conducted by two licensed and/or Certified staff persons, are not available at every change of shift. In those instances, it is recommended that the** **unless all of the below conditions are met, in which case, the required count may be conducted by a** single licensed/Certified staff person coming on or **going off** ~~shift/assignment: conduct a count and sign the medication count book.~~
 - a. **A second licensed/Certified staff person is not scheduled to be on site when the responsibility of the control of the medication key needs to be passed, and**
 - b. **The required two-person count has been conducted within the preceding 24 hours.**
3. **After a single licensed/Certified staff person conducts a required medication count under the above conditions, the following steps must be undertaken:**
 - a. **The single licensed/Certified staff person must sign the *Countable Controlled Substance Book* and note that the count was conducted by a single person rather than two persons, as otherwise required, and**
 - b. **At the first practical opportunity, and no later than 24 hours after the last two-person count was conducted, for a required two-person count must be conducted.**
 - a. ~~Under no circumstances should a two-person count be conducted less than once every twenty-four hours.~~