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NOTICE

TO: Medication Administration Program Administrators and Registered Sites
FROM: David E. Johnson, Director, Drug Control Program
DATE: September 15, 2021
SUBJECT: COVID-19 MAP Virtual Two-Person Count and Disposal of Countable Controlled Substances – Waiver

The Drug Control Program (DCP) Notice dated April 28, 2020 and titled “COVID-19 MAP Virtual Two-Person Count and Disposal of Countable Controlled Substances” expires 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 10-03 *Medication Security and Record Keeping for Schedules II-V*, which generally requires two licensed or MAP Certified staff to conduct a medication count whenever control of the medication key is passed, and MAP Policy 10-05 *Medication Security and Record Keeping for Schedules II-V Disposal*, which requires two licensed or MAP Certified staff to dispose of controlled substances.

In light of these continuing challenges and to provide further flexibility, DCP will accept waiver applications to allow Programs to continue using an alternative process for complying with MAP Policy 10-03 and 10-5, using the attached **Virtual Two-Person Countable Controlled Substances Count**, provided that a two-person count must be conducted *in-person* and *on-site* at least once every 7 days.

An approved waiver will allow this alternative process, developed in consultation with the Massachusetts Rehabilitation Commission (MRC), the Department of Mental Health (DMH), the Department of Developmental Services (DDS), and the Department of Children and Families (DCF), to be used for the following MAP practices, but does not change the regulatory requirement that two licensed or MAP Certified staff are required to conduct the count:

- Adding a newly prescribed countable medication into the count;
- Adding in a refill;
- Transferring the balance from a completed page to a new page, including;
 - two signatures at the bottom of the completed page; and
 - The same two signatures at the top of the new page;
- Disposal; see MAP Policy 10-5; and
- Two-person (*in-person* and *on-site*) count.

DCP recognizes that a Program's need for a waiver may arise urgently and will accept a waiver request up to 48 hours after the Program begins using the alternative process. Note that the term of each approved waiver may be limited to the time necessary to achieve a staffing level sufficient to comply with MAP Policy 10-03 and 10-5.

This alternative count process may be adapted to accommodate the other associated processes as well. If you have any questions please contact your MRC, DDS, DMH or DCF MAP Coordinator.

Attachments:

- COVID-19 Virtual Two-Person Count Waiver Application Template
- COVID-19 Virtual Two-Person Countable Controlled Substances Count (alternative process)

COVID-19 Virtual Two-Person Countable Controlled Substances Count

Virtual Counting – Conditions of Eligibility

1. Two licensed/Certified staff persons are not going to be on-site when the responsibility of the control of the medication key needs to be passed;
2. A two-person count has been conducted in-person within the preceding seven days;
3. One licensed/Certified staff member is on-site; and
4. One licensed/Certified staff member is available remotely.

Virtual Counting – Required Equipment

To conduct a virtual two-person count with one on-site and one remote licensed/Certified staff person using FaceTime or other similar, secure virtual web-based platform (VWP):

1. Each staff member must have a wifi-enabled computer, laptop or smart phone with a microphone and a camera capable of generating a live video feed; and
2. The VWP must be downloaded on each staff member's device prior to starting the count.

Virtual Counting – Process

Once connectivity of the VWP is established between the on-site and remote licensed/Certified staff members, the count should proceed as follows:

1. The on-site staff member will:
 - unlock the (double) key lock box;
 - remove all of the medication from the box; and
 - open the Count Book to the Index.
2. Both staff members (on-site and remote) will:
 - view the index page;
 - use the index as the guide; and
 - identify the first medication listed in the index to be counted.
3. The on-site staff member will:
 - obtain the corresponding blister pack; and
 - open the corresponding count sheet page.
4. Both staff members (onsite and remote) will:
 - view the count sheet page; and
 - view the pharmacy label.
 - the count sheet and the pharmacy label must include the following matching information:
 - the individual's name;
 - the medication name;
 - the medication strength; and
 - instructions for use;
 - view the amount of tablets listed in the "amount" (left) column; and
 - view the number of tabs in the medication blister pack.
 - both staff members will confirm that these numbers agree.
 - examine the blister pack carefully for signs of tampering
 - remote staff will witness documentation of irregularities; and
 - on-site staff will notify the supervisor immediately of any irregularities.
5. If all information is in agreement, the on-site staff member will:
 - place the medication container back into the (double) key locked box.
6. Both staff members will repeat steps 2-5 until
 - all countable medications are accounted for; and
 - all countable medications are secured into the (double) key locked box.

Virtual Counting – Documentation of Process

1. The on-site staff member will document the completion of the virtual count on the Count Signature Sheet in the Count Book, including the following:
 - date/time count is complete;
 - confirmation that the count is correct;
 - note “Yes” or “No”;
 - on-site staff member signature; and
 - printed name of remote staff member
 - note “virtual count”
2. The remote staff member will send an email to the on-site staff member, confirming:
 - date/time count is complete;
 - confirmation that count is correct;
 - note “Yes” or “No”;
 - name of on-site staff member that was witnessed conducting the count; and
 - remote staff member’s name and contact information.
3. The on-site staff member will print and file the email in a Virtual Count Sheet Verification notebook, created on-site for this purpose, each time virtual verification is completed.