



# The Commonwealth of Massachusetts

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## MAP Advisory

**From:** Department of Public Health, Medication Administration Program (MAP)  
**To:** MAP Administrators and Coordinators  
**Date:** April 30, 2022  
**Subject:** Prepackaged Medication Administration by Non-MAP Certified staff in Registered Community Programs

Pursuant to Order No. 2022-13, issued by the Commissioner of Public Health, dated April 30, 2022, non-MAP Certified staff are authorized to possess and administer prepackaged medications to individuals in Department of Mental Health (DMH), Department of Developmental Services (DDS), Department of Children and Families (DCF) and Massachusetts Rehabilitation Commission (MRC) MAP Registered Community Programs, as defined in 105 CMR 700.001, under the following conditions:

1. The Service Provider is responsible for using non-MAP Certified staff to administer prepackaged medications only if standard MAP medication administration is not available.
  - a. The Service Provider is responsible for assuring appropriate consent procedures are followed.
2. Medications must be prepackaged by a MAP Certified Supervisor or their MAP Certified designee, for the individual(s) living at or supported by the MAP Community Program, for up to seven days at a time.
3. Service Providers must have policies and procedures to provide staff guidance on how medications will be administered in such circumstance, including but not limited to:
  - a. Secure storage methods separate from the MAP Community Program medication storage area.
    - i. The prepackaged medications will be placed in a locked container with a combination lock. This container must be separate from the MAP Community Program medication storage area.
    - ii. The MAP Certified Supervisor or MAP Certified designee must limit access to the combination, and change the combination as needed for medication security.
  - b. Prepackaging method for medications to be administered by non-MAP Certified staff.
    - i. The medication must be in packages that are able to be sealed (e.g., a sealable coin envelope), with all medications that are scheduled for the same time (i.e., all 8am medications) being placed in the same package.

1. Each package must be marked with the:
    - Individual's name;
    - Name and dose of each medication in the package;
    - Scheduled time to administer;
    - Date packaged; and
    - Name of MAP Certified Supervisor or MAP Certified designee packaging the medication
  2. If the prepackaged medication involves a countable controlled substance, the medication will be subtracted from the count when prepared into the package.
  3. Once prepared, the package must remain sealed.
    - If a seal is found to be broken, the medication may not be administered, and the MAP Certified Supervisor must be contacted.
- ii. Service Providers must have policies and procedures in place for how PRN ("as needed") medications will be administered.
  - iii. Service Providers must have policies and procedures in place for how medications that require vital signs monitoring and high alert medications will be administered, including additional training and safety procedures (e.g., real-time virtual contact with the MAP Certified Supervisor or MAP Certified designee).
  - iv. Service Providers must make medication information and/or support process with resources available for non-MAP Certified staff.
- c. Separate documentation process from that used by MAP Certified staff;
    - i. The Service Provider must determine the documentation paperwork to be used for medication administration sign off by the non-MAP Certified staff (e.g., calendar page, notebook, sign off on prepack envelopes, etc.).
    - ii. Documentation of the prepackaged medications (including information outlined in 3(b)(i)(1) above) should be completed and maintained at the MAP Community Program.
    - iii. The Service Provider must develop a communication system between the non-MAP Certified staff and the MAP Certified staff to indicate when medications have been administered by non-MAP Certified staff.
  - d. Safety check process for non-MAP Certified staff to follow before administering medications and after administering meds; and
    - i. The MAP Certified Supervisor or MAP Certified designee will inform the non-MAP Certified staff that they must administer medications at particular medication time(s).
    - ii. The MAP Certified Supervisor or MAP Certified designee will inform the non-MAP Certified staff person where the prepackaged medications are located and give them the combination to the area and/or the package.
    - iii. Using a video call or telephone call during the medication administration process *may be an approach* the non-MAP Certified staff person could utilize to ensure that they have selected the correct prepackaged medications and that the correct medications are to be administered to the correct individual.

- iv. The MAP Certified Supervisor or MAP Certified designee will also provide guidance on documentation and securing the rest of the medications.
  - e. Process for inventory and restocking of prepackaged medications
- 4. Chain of Custody requirements remain in effect for all medications in the MAP medication storage area.
- 5. Only MAP Certified/licensed staff are permitted to document on the MAP medication administration sheets (MARs).
  - a. If a non-MAP Certified staff administers the medication from a prepackaged container, the MAP medication sheet will remain blank on the grid for that date/time.
  - b. MAP Certified staff may not administer medication from the prepackaged containers.

This guidance will remain in effect through June 30, 2022, or until the Commissioner rescinds it, whichever occurs first.

If you have any questions or need guidance on how to implement this process, please contact your Department of Mental Health, Department of Developmental Services, Department of Children and Families or Massachusetts Rehabilitation Commission MAP Coordinator.