 Outlook

DCP Regulations

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**Date** Mon 8/11/2025 4:11 PM

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I am writing to provide a comment on the Proposed regulation 105 CMR 775.000: *Certified Medication Aides In Long Term Care Facilities.*

In section 775.004(1): Renewal Requirements, the draft regulation states "A certified medication aide must renew their certification every other year by April 30". We request that the **Drug Control Program** within the Department of Public Health (DPH) consider changing this requirement to make the renewal timeline based on the two-year anniversary associated with the date the candidate was first certified.

This method of determining the recertification timeline aligns with the CNA renewal criteria, which is based on the certification anniversary already, a proposed requirement of CMA renewal. Additionally, this method of determining the recertification timeline prevents any volume issues just ahead of a recertification date with candidates who may require instruction and re-examination.

Additionally, in section 775.003: Certification Requirements, there is a draft requirement that candidates successfully pass an examination within 2 years of the application date to be eligible. We request that DPH considers adding a requirement that the candidate successfully passed an examination within 1 year of the completion of the training. In our experience, we find that candidates have a harder time passing the examinations for medication administration when they experience a substantial delay between the completion of training and their testing. Additionally, a long break between the training and subsequent use of the knowledge and skills can affect retention of knowledge/skills. We think 1 year after successfully completing the training would be a reasonable amount of time to schedule and test, including if multiple test attempts were needed, while also more closely aligning the completion of the training content with the testing.

Thank you for your consideration. Emily Lauer, PhD, MPH

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