

## **Coronavirus Disease 2019 (COVID-19):** UPDATE: Frequently Asked Questions (FAQ) About Modifications to Medication Administration Course Requirements as a Result of the COVID-19 Pandemic **ODP Announcement 20-114**

Note: Modified and updated information appears in **red**.

### **AUDIENCE:**

Providers whose staff, contractors or consultants are required by 55 Pa. Code §§ 2380.129, 2390.198, 6100.468, 6400.169 or 6500.139 to take medication administration training.

Other interested parties.

### **DISCUSSION:**

Per ODP Announcement [20-032](#), 55 Pa. Code Chapters 2380, 2390, 6100, and 6400 provide that a staff person can administer medications to individuals if the staff person successfully completes an ODP-approved medication administration training course. A “standard” medication administration course is required to administer medications in Community Homes, Adult Training Facilities, and Vocational Facilities. A modified version of the course is available for life sharers and service locations that are not licensed by ODP.

Due to the COVID-19 pandemic, ODP **currently allows** staff who are required to take the Standard Medication Administration Training Course (“Standard Course”) to take the Modified Medication **Administration** Training Course (“Modified Course”) until **June 30, 2021**. **Because the effects of the pandemic are ongoing, staff can continue to take the Modified Course in place of the Standard Course until December 31, 2021.**

1. The following must occur prior to a staff person administering medications:
  - a. The staff must complete the [Modified Course](#) online. **Providers must retain a record of staff's completion of the Modified Course by retaining a copy of the certificate of completion**
  - b. The staff must receive training from the provider on the use of the provider's medication record for documenting the administration of medication;
  - c. The staff must be observed administering medications four times by a Certified Medication Administration Trainer or a Qualified Medication Administration Practicum Observer.<sup>1</sup> Observation may be conducted in-person or remotely using video **telecommunication** technology.<sup>2</sup> Remote observation is encouraged to maintain social distancing
  - d. The staff must be observed applying proper handwashing and gloving techniques one time by a Certified Medication Administration Trainer. Observation may be conducted in-person or remotely using video **telecommunication** technology. Remote observation is encouraged to maintain social distancing.
  
2. **Beginning July 1, 2021, staff who have completed the initial requirements to begin administering medications using the Modified Course as above are required to complete additional medication administration observations and Medication Record Reviews as part of the Annual Practicum. This enhanced requirement applies to any staff who have at any time trained with the Modified Course and have not yet completed the Standard Course.**

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<sup>1</sup> Note: The original version of this announcement used the term "Certified Medication Administration Practicum Observer." The term has been changed to "Qualified Medication Administration Practicum Observer" throughout this document to be consistent with updated Department terminology.

<sup>2</sup> Note: The original version of this announcement included the phrase "unless a trainer or observer is not available due to the COVID-19 pandemic." This has been removed as the Department has determined that there is now sufficient access to trainers and observers.

The Department previously required that staff who took the Modified Course in lieu of the Standard Course complete the Standard Course no later than June 30, 2021. Please be advised that this deadline has been extended to December 31, 2022.

The enhanced Annual Practicum requirements are:

- a. Observations of staff administering medications must occur **four** times annually by a Certified Medication Administration Trainer, or Qualified Medication Administration Practicum Observer. **It is recommended that one medication administration observation be completed each quarter.** Observations of the medication administrations may be conducted in-person or remotely using video telecommunication technology. Remote observation is encouraged to maintain social distancing; and
  - b. Medication Record Reviews for the medication administrator must occur **four** times annually by a Certified Medication Administration Trainer or Qualified Medication Administration Practicum Observer. **It is recommended that one Medication Record Review be completed each quarter.** Medication Record Reviews of the medication administrations may be conducted in-person or remotely using video telecommunication technology. Remote reviews are encouraged whenever possible to maintain social distancing.
3. The Annual Practicum requirements for staff who have completed the Standard Course have not changed and must be completed as follows:
- a. Observations of staff administering medications must occur two times a year by a Certified Medication Administration Trainer or Qualified Medication Administration Practicum Observer. It is recommended that one medication administration observation be completed every 6 months. Observations of the medication administrations may be conducted in-person or remotely using video

telecommunication technology. Remote observation is encouraged to maintain social distancing; and

- b. Medication Record Reviews for the medication administrator must occur two times a year by a Certified Medication Administration Trainer or Qualified Medication Administration Practicum Observer. It is recommended that one Medication Record Review be completed every 6 months. Medication Record Reviews of the medication administrations may be conducted in-person or remotely using video telecommunication technology. Remote reviews are encouraged whenever possible to maintain social distancing.

### **Inability to Maintain Qualification to Administer Medications**

If a staff person has been unable to complete all of the required components of the Annual Practicum necessary to remain qualified to administer medications due to a break in service provision as a result of the COVID-19 pandemic, the following applies:

- If it has been **less than a year** since the staff person completed at least one component of the Annual Practicum requirements, then the staff person must fulfill the Annual Practicum Remediation requirements.
- If it has been **a year or longer** since the staff person completed the Annual Practicum requirements to be allowed to administer medications, then the staff person must successfully complete the entire Medication Administration Training Course, handwashing and gloving demonstration, and four medication administration observations to be qualified to administer medications. Staff persons may take the Modified Course in lieu of the Standard Course until **December 31, 2021**. Beginning January 1, 2022, staff persons must take the Standard Course.

### **QUESTIONS AND RESPONSES**

Below are frequently asked questions relating to medication administration requirements that were modified as a result of the COVID-19 pandemic. These questions and responses apply to both new and current staff unless otherwise indicated.

Question	Response
<p><b>REVISED</b></p> <p>1. ODP Announcement 20-032 clarified that the Modified Course is acceptable in lieu of the Standard Course for new staff in licensed settings. <b>Will staff who took the Modified Course have to take the Standard Course at some point?</b></p>	<p><b>Yes.</b> Providers may elect to use the Modified Course in lieu of the Standard Course until <b>December 31, 2021</b>. Any staff hired after December 31, 2021 must take the Standard Course.</p> <p>Any new staff person who took the Modified Course in lieu of the Standard Course between <b>April 1, 2020 and December 31, 2021</b> must complete the Standard Course; as noted above, the Standard Course must be completed by December 31, 2022.</p> <p>Beginning July 1, 2021, all staff who have completed the Modified Course, but have not yet completed the Standard Course must complete the Annual Practicum requirement of four medication administration observations and four Medication Record Reviews per year. It is recommended that one medication administration observation and one medication record review be completed each quarter. Once staff have completed the Standard Course, the Annual Practicum requirement is two medication administration observations and two Medication Record Reviews a year. This applies to all individuals who have completed the Modified Course since March 2020.</p>

Question	Response
<p><b>REVISED</b></p> <p>2. A Certified Medication Administration Trainer or Qualified Practicum Observer must observe staff who took the Modified Course in lieu of the Standard Course performing the following activities two times annually:</p> <ul style="list-style-type: none"> <li>• Administering medication(s) to an individual, and</li> <li>• Properly documenting medication administration in the Medication Record.</li> </ul> <p>Observation of the two items above is called the “Annual Practicum.”</p> <p><b>How long will staff who took the Modified Course in lieu of the Standard Course have to complete the Annual Practicum?</b></p>	<p>Staff who took the Modified Course in lieu of the Standard Course <b>must complete Annual Practicum requirements yearly based on the date of completion of the Modified Course. Once the Standard Course has been completed, the date of completion for the Standard Course will become the date for yearly completion of the Annual Practicum.</b></p> <p>For example, a staff person who completed the Modified Course on August 15, 2020 must complete the Annual Practicum requirements by August 15, 2021.</p>
<p><b>3. When do staff who were Certified Medication Administration Trainers before the pandemic and who administer medications have to complete their Annual Practicum?</b></p>	<p>Staff who were Certified Medication Administration Trainers before the pandemic must complete their Annual Practicum within one year of the date of the last practicum.</p>

Question	Response
<p>4. In order to successfully complete either the Modified Course or the Standard Course, staff must be observed administering medication four times.</p> <p><b>Will staff who took the Modified Course in lieu of the Standard Course have to be observed administering medications as a condition of completing the Standard Course?</b></p>	<p><b>No.</b> Staff persons who took the Modified Course in lieu of the Standard Course do not have to be observed administering medications as a condition of completing the Standard Course.</p> <ul style="list-style-type: none"> <li>• If staff successfully complete the Standard Course within one year of successful completion of the Modified Course, the four medication observations that occurred as part of the successful completion of the Modified Course are sufficient. A second set of four observed medication administrations is not required as a condition of completing the Standard Course.</li> <li>• If more than one year passes between successful completion of the Modified Course and the Standard Course, an Annual Practicum must have been completed yearly based on the date of completion of the Modified Course. The Annual Practicum is sufficient and a second set of four observed medication administrations is not required as a condition of completing the Standard Course.</li> </ul>

Question	Response
<p><b>5. Can Medication Record Reviews and observations continue to be conducted remotely?</b></p>	<p><b>Yes.</b> Medication Record Reviews and observations of medication administration may continue to be conducted in person or remotely using live video telecommunication technology through December 31, 2021.</p> <p>Remote observation is encouraged to maintain social distancing. Proper handwashing and gloving techniques can also be observed using live video telecommunication technology. It is not acceptable to view video recordings of these events.</p> <p>Documentation of the successful completion of Medication Record Reviews and medication administration observations for each staff person must be retained.</p>
<p><b>6. Can training for non-oral routes of medication administration continue to be conducted remotely?</b></p>	<p>Training for non-oral routes of medication administration that is permitted to be provided by a certified trainer can be conducted remotely using video telecommunication technology but must be live, not recorded.</p>
<p><b>7. What is the status of Train the Trainer re-certification extensions?</b></p>	<p>Certification for anyone who is currently a Certified Medication Administration Trainer was extended to September 30, 2020.</p> <p>If recertification was not completed by September 30, 2020, the Certified Trainer must</p>

Question	Response
	<p>request an extension, which will be reviewed on a case-by-case basis. Certified Trainers will not be permitted to perform their tasks as a trainer without either an extension or a completed recertification.</p>
<p>8. <b>What is the status of Practicum Observer requalification extensions?</b></p>	<p>Qualification for anyone who is currently a Practicum Observer was extended to September 30, 2020.</p> <p>If requalification was not completed by September 30, 2020, the Practicum Observer must request an extension, which will be reviewed on a case-by-case basis. Practicum Observers will not be permitted to perform requalifications without either an extension or a completed requalification.</p>
<p>9. Life Sharing staff, consultants, and contractors were required to complete the Modified Course by December 1, 2020. <b>Has ODP considered delaying this requirement due to the COVID-19 pandemic?</b><sup>3</sup></p>	<p>All staff, contractors and consultants who are required to successfully complete the Modified Course were required to do so by December 1, 2020. ODP will grant no further extensions for the successful completion of the Modified Course.</p>

<sup>3</sup> Note: The question in the original version of this announcement read “Life Sharing staff, consultants and contractors were required to complete the Modified Medication Administration Training Course by July 1, 2020. Has ODP considered delaying this requirement due to the COVID-19 pandemic?” The question has been modified as ODP did extend the deadline as reflected in the answer to the original version.

Question	Response