HEADS UP…

TOPIC: Safe Storage of Medications
***SETTING:* Behavioral Health Care (BHC)**

The Joint Commission

Why is this important?

Medication storage is a key component of a safe and effective medication management system. Medication storage is designed to assist in maintaining medication integrity, availability, minimize risk of diversion, and reduce potential dispensing errors.[i]

Scope of the problem:

Time period: **January 1, 2023, through September 30, 2023**
Number of full surveys performed: **1,179**
Number of surveys with findings at **MM.03.01.01 EP** 4 for all SAFER placements: **78 (7%)**
Relevant standard: MM.03.01.01 The organization safely stores medications. Note: This standard is applicable only to organizations that store medications at their sites. **EP 4** The organization follows a written policy addressing the control of medication between receipt by staff and administration of the medication, including safe storage, handling, wasting, security, disposition, and return to storage.

Sample survey observations [from surveyor notes] and contributing factors

- The controlled substances count log was not consistently being signed by incoming and outgoing nurses per policy
- Patients receiving take-home doses did not return bags from previous take-homes for inspection as required by organization policy
- There was only one staff signature/initial of destruction of controlled medications (instead of two per organization policy)
- Controlled medication policy lacks process of receipt and disposition of these medications.
- Controlled medication logs did not match the number of stored controlled medications.
- The HCO policy on control of medications did not address handling of sample medications.
- The physician in the clinic did not comply with the written policy on the handling of sample medications.

Possible Contributing Factors

- Lack of training, education, and clear expectations regarding medication storage policies and procedures
- Medication policies were not updated or revised to including medication storage, handling, or disposal
- Staff members were not held accountable for missing or incorrect medication counts
- Appropriate quality control activities were not developed or performed for routine surveillance of the processes
- The organization did not identify a qualified leader (e.g., RN) to develop and oversee the implementation of the policy
- The organization did not account for or address injectable medications storage processes, including expiration
- Controlled medications were not handled in accordance with law and regulation

How to identify potential problems in your organization

Review your policies and procedures

☐ Does the organization have a written policy that addresses control of medication between receipt by staff and administration of the medication that includes: (1) Safe storage, including return to storage, (2) Handling, (3) Wasting, (4) Security (5) Disposition?

Interview staff

☐ Has staff received training and education regarding the policies and procedures for safe storage of medication?
☐ Can staff describe the procedures in place to prevent diversion of controlled medications, including take-home medications?
☐ Can staff describe the procedure for medication disposal and destruction (when and how)?
☐ What type of qualified supervision and support do staff receive?

Assess and monitor

☐ Conduct a risk assessment to identify any potential or actual risks or any potential failure points in the process.
☐ Conduct weekly or monthly audits of the medication rooms, storage rooms, and nursing stations to ensure medications awaiting disposition are secured.
☐ Review the medication log daily to for medication reconciliation and ensure two staff signatures are present.
☐ Conduct random audits of individual rooms and ensure that keys to locked books are secure.
☐ Ensure all staff receive training and education by reviewing attendance sheets.

Evaluate implementation

☐ Review data/documentation for compliance with policies and procedures.
☐ Aggregate data to identify non-compliant trends.
☐ Present information to staff, ask for feedback and input on barriers that contribute to non-compliance.
☐ Compare non-compliance over time (monthly, yearly) to assess for improvement.

What resources can assist in mitigating risks in these areas?

Quick Safety Issue 26: Transitions of Care and Managing Medications (April 2022)

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[i] Medication management storage (definition from glossary): The task of appropriately maintaining a supply of medications on the organization's premises. Secure: In locked containers, in a locked room, or under constant surveillance. Prescribing or ordering: The process of a physician or other licensed practitioner transmitting a legal order or prescription to an organization, directing the preparing, dispensing, and administration of a specific medication to a specific individual. It does not include requisitions for medication supplies.