

Home Health Line Tool

Survey guidance on medication management

Surveyors are provided specific instructions, via the Survey Guidance Manual's Appendix B, regarding medication management. For example, when planning a home visit, the surveyor is instructed to obtain a copy of the medication list prior to the visit.

Below are some of the specific survey citations related to medication management and CMS' instructions to surveyors. Share this with your staff to help them understand why adhering to policies around this is so important.

G536

§484.55(c)(5): The comprehensive assessment must include a review of all medications the patient is currently using in order to identify any potential adverse effects and drug reactions, including ineffective drug therapy, significant side effects, significant drug interactions, duplicate drug therapy, and noncompliance with drug therapy.

Interpretive guidelines: The patient's clinical record should identify all medications that the patient is taking, both prescription and non-prescription (e.g., over-the-counter drugs, herbal remedies, and other alternative treatments that could affect drug therapy), as well as the dose, route, frequency, or time of administration when indicated on the prescription or order. The skilled professional performing the comprehensive assessment should consider, and the clinical record should document, that the skilled professional considered each medication the patient is currently taking for possible side effects and the list of medications in its entirety for possible drug interactions. Each agency must determine the capabilities of current staff members to perform comprehensive assessments, considering professional standards or practice acts specific to the State. No specific discipline is identified as exclusively able to perform the medication review. However, only Registered Nurses (RNs), Physical Therapists (PTs), Occupational Therapists (OTs) and Speech-Language Pathologists (SLPs) are qualified to perform comprehensive assessments (see also §484.55(b)). While only the assessing clinician is responsible for accurately completing and signing a comprehensive assessment, the agency may develop a policy where clinicians may collaborate to collect data for all OASIS items. For example, to assess potential side effects and drug interactions, the agency may wish to have RNs or practical (vocational) nurses, as defined in §484.115, review the medication lists. The agency should have policies that guide staff in the event there is a concern identified with a patient's medication that should be reported to the physician or allowed practitioner.

Survey procedures: Through home visit observation and record review, confirm the medications the patient identifies they are taking against the medical record documentation to verify that the agency identified all medications, both prescription and non-prescription.

G574

§484.60(a)(2)(x): The individualized plan of care must include all medications and treatments.

Interpretive guidelines: A detailed, individualized plan of care is critical to both the quality and safety of patient care and therefore each of the required elements must be included.

G616

§484.60(e)(2): Patient medication schedule/instructions, including: medication name, dosage and frequency and which medications will be administered by agency personnel and personnel acting on behalf of the agency.

Interpretive guidelines: The agency must prepare, and provide to the patient and his or her caregiver (if any) written information regarding the patient's medication regimen as based on the results of the medication review conducted at §484.55(c)(5). The medication administration instructions must be written in plain language that does not use medical abbreviations.

The agency must provide this information to the patient regardless of whether the patient is receiving only rehabilitation therapy services. See §484.55(c)(5) for communication between the therapist and the agency nurse regarding medications.

Survey procedures: Review the most current medication list that the agency personnel provided to the patient. Determine if the medications match those listed in the comprehensive assessment, the plan of care, and the written information to the patient. Investigate any discrepancies for additions or deletions to the medications since the information was last updated by the agency.