

New ODP Regulation Update: Clarification Regarding Medication Administration Requirements ODP Announcement 20-014

AUDIENCE:

All Interested Parties

PURPOSE:

To announce that requested clarification has been developed regarding Medication Administration requirements in 55 Pa. Code §§6100.461 – 6100.469.

DISCUSSION:

The Office of Developmental Programs (ODP) has received many questions and requests for clarification from stakeholders regarding Medication Administration contained in 55 Pa. Code §§6100.461 – 6100.469. To communicate requested guidance ODP has developed two attached documents: 1) A Medication Administration Question and Answer document; and 2) A Medication Administration Training Requirements by Service document. The Question and Answer document will be continually updated as questions and requests for clarification are received.

Medication Administration Training Requirements

The majority of questions and requests for clarification center around medication administration training requirements. The following guidance has been published in previous communications and/or is available on MyODP.

- ODP communication 19-156 states, “In accordance with § 6100.468(d), life sharers and service locations that are not licensed by the Department (DHS) will be required to successfully complete a modified medication administration course. This requirement is being delayed until July 1, 2020. This means that any

staff required to take the course must do so by July 1, 2020, to be compliant with the regulatory requirements.”

- The Modified Medication Administration Course may be accessed on MyODP at this link: <https://www.myodp.org/course/view.php?id=1457>. This page contains the following guidance about who is required to take the Modified Medication Administration Course:

“The Modified Medication Administration Training Course is required for:

- All Life sharers as well as any other staff, consultants and contractors who will administer medications as part of the Life Sharing service. This includes Life Sharing services rendered in licensed and unlicensed Life Sharing homes as well as Life Sharing services rendered by relatives or people who are not related to the individual.
- Staff, consultants and contractors who are not related to the individual who administer medications as part of a waiver or base-funded service in unlicensed settings.

The Modified Medication Administration Training Course is not required for:

- Staff, consultants and contractors who provide respite care or job coaching for fewer than 30 days in a 12-month period.
- Staff, consultants and contractors who are related to the individual who provide waiver or base-funded services in unlicensed settings other than Life Sharing.

Any current staff, consultants and contractors required to take the Modified Medication Administration Training Course must successfully complete the course by July 1, 2020, to be compliant with the regulatory requirements § 6100.468(d).”

More information about the Standard Medication Administration Training Course required in settings licensed under 55 Pa. Code Chapters 2380, 2390 and 6400 can be found at <https://medsadmin.myodp.org/cms/>.

It is important to note that 6100.468(a) states that a person who has successfully completed a Department-approved medication administration course, **including course renewal requirements**, may administer medications in accordance with the regulations. The attached Medication Administration Question and Answer document clarifies that staff, contractors and consultants who are required to take the Modified Medication

Administration Training Course must also take a renewal course every 2 years that must occur no later than the last day of the 24th month following the previous completion date (Questions 15 and 16).

ATTACHMENTS:

- Medication Administration Question and Answer
- Medication Administration Training Requirements By Service

To request technical assistance or submit a question, please use the following address RA-PWODP6100REGS@pa.gov.