

Coronavirus Disease 2019 (COVID-19): Frequently Asked Questions (FAQ) About Modifications to Medication Administration Course Requirements as a Result of the COVID-19 Pandemic

ODP Announcement 20-102

AUDIENCE:

All Stakeholders 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 and 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 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 has temporarily allowed staff who are required to take the standard medication administration course to take the modified medication course. In order to ensure that individuals who require assistance with medication receive such assistance, staff required to take the standard medication administration course may administer medications after successfully completing ODP’s Modified Medication Administration Training Course, available on www.MyODP.org (<https://www.myodp.org/course/index.php?categoryid=11>).

1. For staff to successfully complete the initial phases of the Modified Medication Administration Training Course, prior to administering medications, the following must occur:
 - a. The staff must receive training from the provider on the use of the provider’s medication record for documenting the administration of medication; and

- b. The staff must be observed administering medications four times by a Certified Medication Administration Trainer or Certified Medication Administration Practicum Observer, unless a trainer or observer is not available due to the COVID-19 pandemic. Observation may be conducted in-person or remotely using video interface technology. Remote observation is encouraged to maintain social distancing; and
 - c. 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. Staff who have completed the initial requirements to begin administering medications as above must also comply with same the annual practicum requirements as those staff who have completed the standard medication administration training course. These requirements are:
- a. Ensure observations of medication administrators occur two times annually by a Certified Medication Administration Trainer or Certified Medication Administration Practicum Observer. Observations of the medication administrations may be conducted in-person or remotely using video telecommunications technology. Remote observation is encouraged to maintain social distancing; and
 - b. Ensure Medication Record Reviews for the medication administrator occur two times annually by a Certified Medication Administration Trainer or Certified Medication Administration Practicum Observer. Medication Record Reviews of the medication administrations may be conducted in-person or remotely using video telecommunications technology. Remote reviews are encouraged whenever possible to maintain social distancing.

Providers must retain record of staff's completion of the Modified Medication Administration Training Course by retaining a copy of the certificate of completion.

QUESTIONS AND RESPONSES

Below are frequently asked questions (FAQs) 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>1. ODP Announcement 20-032 clarified that the Modified Medication Administration Training Course is acceptable in lieu of the standard course for new staff in licensed settings. Will staff who took the modified course have to take the standard course at some point?</p>	<p>Yes. Providers may elect to use the modified course in lieu of the standard course until December 31, 2020.</p> <p>Any staff person who took the modified course in lieu of the standard course between the period of April 1, 2020 to December 31, 2020 must complete the standard course within one year of completion of the modified course. For example, a staff person who completed the modified course on August 15, 2020 must complete the standard course by August 15, 2021.</p>
<p>2. A Medication Administration 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"> • Administering medication(s) to an individual, and • Properly documenting medication administration in the Medication Record 	<p>As noted above, any staff person who took the modified course in lieu of the standard course between the period April 1, 2020 to December 31, 2020 must complete the standard course within one year of completion of the modified course. An Annual Practicum must be completed within one year of completion of the standard course.</p> <p>For example, a staff person who completes the standard course on August</p>

Question	Response
<p>Observation of the two items above is called the “Annual Practicum.”</p> <p>How long will staff who took the modified course in lieu of the standard course have to complete the Annual Practicum?</p>	<p>15, 2021 must complete an Annual Practicum by August 15, 2022.</p>
<p>3. When do staff who were Certified Medication Administration Trainers before the pandemic and who administer medications have to complete their Annual Practicum?</p>	<p>Staff who were Certified Medication Administration Trainers before the pandemic must complete their Annual Practicum based on the date the last practicum was completed.</p>
<p>4. In order to successfully complete either the modified or standard course, staff must be observed administering medication four times.</p> <p>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?</p>	<p>No.</p> <p>The four medication observations that occurred for successful completion of the modified course are sufficient. A second set of observations are not required to successfully complete the standard course within a year of successfully completing the modified course.</p>
<p>5. Can Medication Record Reviews and observations continue to be conducted remotely?</p>	<p>Yes.</p>

Question	Response
	<p>Through December 31, 2020, Medication Record Reviews and observations may continue to be conducted in person or remotely using live video telecommunications technology.</p> <p>Remote observation is encouraged to maintain social distancing. Proper handwashing and gloving techniques can also be observed using live video telecommunications technology. It is not acceptable to view video recordings of these events.</p> <p>Appropriate staff records must be retained.</p>
<p>6. Can training for non-oral routes of medication administration continue to be conducted remotely?</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>7. What is the status of Train the Trainer re-certification extensions?</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 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</p>

Question	Response
	<p>either an extension or a completed recertification.</p>
<p>8. What is the status of Practicum Observer re-certification extensions?</p>	<p>Certification for anyone who is currently a Practicum Observer was extended to September 30, 2020.</p> <p>If recertification 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 their tasks as an observer without either an extension or a completed recertification.</p>
<p>9. 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? Some host families need assistance using technology to complete the course.</p>	<p>All staff, contractors and consultants who are required to successfully complete the Modified Medication Administration Training Course were required to do so by July 1, 2020, if they have the proper equipment (computer and internet or smartphone) and do not require assistance. This includes staff, contractors and consultants who will administer medications as part of the Life Sharing service. If staff, contractors or consultants do not have the proper equipment or require assistance to complete the course, which cannot safely be provided due to COVID-19, they have until December 1, 2020 to do so. This course is critical to ensuring the health and safety of individuals to whom medications are administered. ODP will grant no further</p>

Question	Response
	extensions for the successful completion of the Modified Medication Administration Training Course.

OBSOLETE ANNOUNCEMENTS

This announcement obsoletes ODP Announcement 20-075, *Extension of Annual Practicum Deadline for Medication Administration Trainer Recertification*.