

**STATE OF CONNECTICUT  
DEPARTMENT OF DEVELOPMENTAL SERVICES**

**Procedure No:** I.D.PR.015

**Subject:** Medication Administration Sanctions  
Process for Licensed Nurses

**Section:** Quality Enhancement

**Issue Date:** November 8, 2010

**Effective Date:** November 8, 2010

**Approved:** /s/Peter H. O'Meara/KdP

**A. Purpose**

To identify the standardized process to address the violations by licensed nurses of DDS Medication Administration Regulations and best practice standards including, but not limited to those practices identified in the Medication Administration Manual for Licensed Nurses. When it is identified that a licensed nurse has failed to meet these standards that nurse shall be subject to the actions identified in the Medication Administration Sanction Process for Licensed Nurses. If at any time, the action/inaction of the nurse violates the Nurse Practice Act/scope of practice considerations, and/or abuse or neglect is substantiated, a referral by the nurse manager in consultation with the Director of Health and Clinical Services and Human Resources to the Practitioner Unit at Department of Public Health (DPH) may be made. At all times the safety of the consumer shall be considered when errors and/or prohibited practices are identified.

**B. Applicability**

This procedure applies to all licensed nurses who administer medications in residential or day programs or respite programs and/or are involved in the clinical supervision of this process, and to the administrative supervisors who are responsible for the implementation of progressive discipline. All private residential or day program or respite program providers licensed or funded by DDS are required to have a written policy that identifies the corrective procedures to be followed in the event licensed nurses make errors in the administration of medication. These agencies may adopt this procedure or develop a substantively similar procedure.

**C. Definitions**

Administrative Supervisor/Manager - The individual who has oversight of an employee's job performance and is responsible for following Human Resources' policies and procedures in the application of disciplinary actions.

Class A error or prohibited practice - Type of action/inaction committed by the licensed nurse that generally involves documentation requirements, medication supply and/or security/possession of keys for medication storage areas.

Class B error or prohibited practice - Type of action/inaction committed by the licensed nurse that generally involves a violation of any of the five rights, transcription activities that result in an error and/or handling medications incorrectly.

Class C error or prohibited practice - Type of action/inaction committed by the licensed nurse that generally involves:

- The death of a person.
- Injury requiring hospitalization or medical treatment at an emergency department, clinic or health care provider's office.
- Falsification of documentation (i.e. medication administration paperwork, certification paperwork, etc.)
- Administration of medication when requirements identified by DDS have not been met.

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Corrective action - remedial step(s) taken by the supervising RN following a medication error(s) or prohibited practice incident(s) that is (are) intended to prevent duplication of the licensed nurse's action/inaction that caused the incident.

Documentation - a general practice standard of medication administration that indicates that a dose of medication has been administered to a person at the identified time, following the instructions of the prescriber. This standard includes the "right" documentation for the medication and circumstances of administration (i.e. documentation on the receipt and disposition record for controlled medications, documentation of the effect of medications administered on an as needed basis [PRN], etc.).

Error - Defined in the DDS Medication Administration Manual for Licensed Nurses to mean:

- Failure to administer medication to an individual
- Failure to administer medication within one hour of the scheduled time (as indicated by the RN or time designated by the prescribing practitioner)
- Failure to administer the specific medication prescribed for the individual
- Failure to administer the correct dosage of medication
- Failure to administer the medication by the correct route
- Failure to administer the medication according to generally accepted medical practices

Five Rights - Five (5) areas of consideration in the accurate administration of medications that include:

- Right individual for whom the medication is prescribed.
- Right time medication is prescribed to be administered.
- Right medication as prescribed.
- Right dose of the medication as prescribed.
- Right route of administration as prescribed.

Levels of Offense - The steps in the sanction process that identify the actions that are taken by the supervising RN and administrative supervisor/manager when the medication administration regulations have been violated. The level of offense is determined by the type, number and frequency of errors or prohibited practices committed by the licensed nurse as outlined in Public Sector Sanctions for Licensed Nurses (Attachment A).

Medications - Any medicinal preparation including controlled substance.

Occurrence - Any combination of one or more errors or prohibited practices committed by the same person that happens before retraining is completed.

Omission - A medication error in which medication(s) have not been administered as prescribed, or may have been administered but there has been no documentation of the administered dose(s) by the time the responsible licensed nurse has gone off duty. Prompt documentation on the MAR is the medically accepted practice that identifies that a medication has been administered as prescribed.

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Pattern of Sanctions - A state of concern that exists when a licensed nurse, despite retraining and the imposition of sanctions, continues to commit actions that violate the medication regulations. A pattern of sanctions may precipitate a referral by the nurse manager in consultation with the Director of Health and Clinical Services and Human Resources to the Practitioner Unit at Department of Public Health (DPH) for further investigation.

Prohibited Practice - An action or inaction in the process of medication administration that violates state or federal law; DDS regulation; or generally accepted medical practices.

Responsible Persons - Individuals (i.e. RN, Nurse Supervisor, Director of Health Services, Director of Nursing Public Programs) identified in the Public Sector Sanctions for Licensed Nurses (Attachment A) who are accountable for implementing the identified sanctions.

Suspension of the responsibility to administer medications - Suspension of medication responsibilities will be done by the supervising RN.

RN On Call - The regional communication system that identifies one or more RNs within specific areas who are responsible for responding to calls made outside of normal business hours.

Sanction - The consequence to licensed nurses for noncompliance with the medication administration regulations.

Supervising Nurse - The RN who is assigned to the supervision of the licensed nurse who committed the medication administration violation.

**D. Implementation:**

1. Nurses licensed in the State of Connecticut are expected to possess the knowledge and at least a baseline proficiency (specific to the license) in the administration of medications per all routes common to the needs of the persons served by the department.
2. Medications administered by licensed nurses to persons supported by the Department of Developmental Services (DDS) shall be done in a manner that is consistent with scope of practice considerations as identified by the Board of Examiners for Nursing, and the standards identified by DDS.
3. Licensed nurses will receive instructions on the accepted procedures via the approved DDS Medication Administration Manual.
4. When the supervising nurse or the RN on Call is notified that an error or prohibited practice has been committed or identified, he/she shall collect information to be able to assess the situation and identify action(s) to ensure the health and safety of the individual(s). This action may include but is not limited to:
  - a. Contacting the primary health care provider.
  - b. Directing licensed nurse to closely observe the individual.
  - c. Implementing and notifying staff of new orders.
  - d. Instructing non-licensed staff to monitor for possible side effects.

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- e. Suspending the responsibility of medication administration by the responsible licensed nurse to ensure the health and safety of individuals until fact-finding has been completed. (Attachments F – Medication Administration Sanction Notification; Attachment G – Acknowledgement of Medication Administration Sanctions for Licensed Nurses)
5. When the fact-finding has been completed, the supervising nurse will be responsible to identify the class of each error and/or prohibited practice committed by the licensed nurse during that occurrence. Questions about this determination should be referred to the nurse's clinical supervisor.
  6. Sanctions for licensed nurse are identified according to the level of offense in the Public Sector Sanctions for Licensed Nurses document (Attachment A). This document also identifies the responsible person(s) who shall implement the process.
  7. The number and class of errors or prohibited practices committed by the licensed nurse along with the person's history of errors will determine the level of offense in the sanction process.
  8. The supervising RN will be responsible for tracking the errors and prohibited practices committed by licensed nurses, and for maintaining documentation of this medication administration history. This documentation shall be recorded by using the Licensed Staff Medication Offense Tracking Form (Attachment B). A point value shall be applied to the occurrence for the purpose of tracking. If the licensed nurse commits an error at a site other than his/her primary work site, the secondary supervising RN is responsible for communicating the details of the occurrence to the primary supervising RN so this information can be recorded and added to any previous history. If the licensed nurse transfers his/her primary work site within the region, this information and supporting documentation shall be transferred to the new primary supervising RN.
  9. The Sanction Process for licensed nurses includes educational supports that will be provided to the nurse to assist him/her to correct the behavior or knowledge deficit that caused the error, with the expectation of preventing future errors from occurring. Corrective action in the form of retraining by the supervising RN shall be implemented and documented on the appropriate Retraining Record (attachments C, D and E) following the identification of all errors and prohibited practices. In addition to this training, the licensed nurse may be required to complete additional standardized training. This may include:
    - a. Review of the appropriate Self Study Training Sheets
    - b. Review of the appropriate section of the DDS Medication Administration Manual for Licensed Nurses.
    - c. Completion of DDS Medication Administration Principles and Practices class for Licensed Nurses.
    - d. Mentored and/or supervised medication pass/passes.
    - e. Additional retraining support with NCI, Nurse Supervisor, etc. as determined by the HSD/DONPP

To protect the individuals served, the need for completion of the required retraining may be imposed before the licensed nurse may resume administration of medication.

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10. The extent of retraining shall be recommended in the sanction process and will depend on the licensed nurses' history regarding errors and retraining. The nurse supervisor in consultation with the Health Services Director/Director of Nursing for Public Programs will make the final determination regarding this. Retraining by the supervising RN is not considered disciplinary action, however, the supervising RN shall maintain documentation of all retraining.
11. Following retraining, the supervising RN shall communicate in writing with the Program Supervisor/ Nursing Supervisor (whichever is applicable) using the Sanction Notification Form (Attachment F). This will document the occurrence and shall identify the retraining provided as well as the level of offense.
12. The recommended action appropriate to the level of offense is identified in the Public Sector Sanction for Licensed Nurses (Attachment A). All disciplinary procedures including the issue of union representation will be conducted in accordance with the collective bargaining agreement.
13. All disciplinary action taken as a result of the medication administration sanction process shall be incorporated by the supervisor into the employee's annual performance appraisal.
14. Each medication error and/or prohibited practice committed shall be reviewed by the supervising RN and Nurse Supervisor. For the most part, medication errors shall be addressed through the sanction process and would not rise to the level that would warrant report and investigation in the abuse/neglect system.

**E. References:**

Chapter 378 of the Connecticut General Statutes "Nursing, Nurse Practice Act"  
CT Board of Examiners for Nursing Declaratory Ruling on Delegation to Non-licensed Personnel  
DMR Medical Advisory #99-3: Interpretive Guidelines for the DDS Regulations Concerning  
Administration of Medication by Certified Unlicensed Personnel (removed).

Medication Administration Manual for Licensed Nurses – February 2009 Self-Study Training  
Sheets contained in the Medication Administration Manual for Licensed Nurses

1. General Responsibilities associated with Medication Administration.
2. Responsibilities before medication is administered.
3. Responsibilities when preparing medication for administration.
4. Responsibilities as medication is administered.
5. Responsibilities after medication is administered.
6. Medication administration route techniques
7. Responsibilities associated with the administration of medication via enteral feeding tubes.
8. Documentation of medication administration.
9. Transcription responsibilities.
10. Obtaining medications from the pharmacy.
11. Responsibilities associated with administration of controlled drugs.

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**F. Attachments:**

- I.D.PR.015 Attachment A: Medication Administration Sanctions for Licensed Nurses
- I.D.PR.015 Attachment B: Licensed Nurse Medication Administration Error/Prohibited Practice Tracking Form
- I.D.PR.015 Attachment C: Class A Retraining Record
- I.D.PR.015 Attachment D: Class B Retraining Record
- I.D.PR.015 Attachment E: Class C Retraining Record
- I.D.PR.015 Attachment F: Medication Administration Sanction Notification Form
- I.D.PR.015 Attachment G: Acknowledgement of Medication Sanctions for Licensed Nurses Regarding Medication Administration in DDS Facilities