



Legislative Audit Division

Performance Audit Summary

Safeguarding Medication Stored and Administered at State Custodial Facilities

March 2002

Introduction

The Legislative Audit Committee requested a performance audit to assess the level of security over medication maintained in state facilities. This issue arose from LAD staff observations of less than adequate practices in the security over drug supplies at state custodial and correctional facilities. The focus of this audit was on facilities operated by the Department of Public Health and Human Services (DPHHS). There are seven such facilities in Montana:

1. Eastern Montana Veterans Home – Glendive
2. Eastmont Human Services Center – Glendive
3. Mental Health Nursing Care Center – Lewistown
4. Montana Chemical Dependency Center – Butte
5. Montana Developmental Center – Boulder
6. Montana State Hospital – Warm Springs
7. Montana Veterans Home – Columbia Falls

The department is responsible for providing a full spectrum of health care services to juvenile and adult patients and residents housed in these facilities. Health care services include supplying medication. Medication includes prescriptions, over-the-counter drugs, and controlled substances as defined by the U.S. Department of Justice, Drug Enforcement Administration. The review encompassed medication handling from the time it is received at the facility – through administration of medication to patients/residents – to return of any unused medication to the pharmacy provider.

objective was to review the administration of medication to patients/residents to determine if legal and professional practice guidelines are followed.

Background

Site and procedural observations were a key part of controls testing. In order to ensure our work fairly represented operations, we performed observations during a variety of staff shifts, and in a number of locations within each of the seven facilities. Visits were announced in advance to facility management and nursing staff. At the conclusion of audit work at each facility, we met with facility and nursing management to discuss our recommendations to improve administration and controls over medication. Facility management indicated they would begin immediate action to resolve concerns.

Improving Controls Over Medication Process

Controls over medication storage and the process used to administer medication could be improved. While some facilities had a good system of controls in place with few improvements needed, other facilities need more improvements. *We believe the department can take action towards strengthening controls by clarifying what is expected of staff, and reinforcing those expectations through monitoring to ensure controls are adhered to.*

Our recommendations fall into four general areas:

1. physical security,
2. administration of medication,
3. controlled substances, and
4. general administration.

Physical Security

Laws, regulations, and facility policy require staff to store medication in locked compartments under proper temperature controls, and permit only authorized personnel to have access to the keys and storage areas. All medications should be maintained under lock and key with access restricted to appropriate individuals.

We observed numerous lapses in security of medication including unlocked medication storage areas, doors to medication storage rooms left open, non-functioning locks, and access to keys not adequately restricted.

**Number of Prescriptions Dispensed at DPHHS Facilities
(June, July, August 2001)**

Facility	Average	Rxs	Rxs	Rxs
	Number Patients	June	July	Aug
East MT Vet Home	53	393	368	353
Eastmont Nursing Care	33	199	202	258
Chemical Depend Developmental Ctr	120	1116	1118	1022
State Hospital	52	204	169	136
MT Vet Home	91	820	743	790
Total	183	2403	2356	2934
	106	397	614	538
	638	5532	5570	6031

Our audit focused on controls used at each facility to physically safeguard all types of medications. A secondary

Controls over the physical security of medication could be improved at each of DPHHS's seven facilities.

Management needs to emphasize the importance of good security procedures by periodically checking storage areas to ensure they are kept locked. In addition, efforts should focus on reviewing which individuals have access to medication storage areas and keys, and restrict this access as appropriate to their job duties. The department needs to ensure each of its facilities adheres to federal requirements and facility policy, and have procedures in place to adequately safeguard medications at all times.

Administration of Medication

Adhering to regulations, policy and other criteria helps ensure medication is correctly given and patients/residents are not given incorrect medication or dosages, or contaminated medication. These controls are designed to reduce the risk of medication errors. The vast number of medications that need to be administered in all DPHHS facilities, and the pressure of multiple nursing priorities complicate drug administration and can lead to errors.

We observed many instances where protocol related to administration of medication was not consistently followed at DPHHS facilities. We found methods staff followed to prepare medication in advance of administration do not adhere to Board of Nursing directives and nursing protocol. We observed nursing staff administer medication to patients/residents without first checking medication administration records to ensure correct medication and dose is given. Nursing staff also did not always chart medication as soon as it was given but instead waited until all patients/residents were given their medication or until the end of their shift. Some nurses charted medication prior to administering it. We also witnessed several occasions where medication was improperly disposed. We found some expired, non-labeled, and discontinued medication in medication carts and refrigerators. In addition, although only licensed nursing staff should administer medication, one facility did periodically allow resident care aides to administer medication.

All facilities rely primarily on licensed nursing staff to administer medication. This provides a solid foundation in the area of medication administration. Any problems are due in part to long-standing practices followed by some staff. In addition, staff turnover and new nursing staff add other challenges to ensuring proper practices are followed.

The department needs to ensure nursing staff are trained and understand the importance of following proper protocol when administering medication. This should include new nursing staff and contract nurses, as well as experienced nursing staff. Active monitoring by facility and nursing management to ensure protocol is followed will reinforce good practices.

Controlled Substances

Controlled substances require different handling, inventory controls, and documentation. This category of drugs includes narcotics, stimulants, depressants and hallucinogenics. Due to the abuse potential and risk associated with these drugs, the U.S. Department of Justice, Drug Enforcement Administration, developed regulatory requirements governing their manufacture, distribution, and dispensing.

During our testing, we observed multiple lapses in security over controlled substances that provide opportunity for misuse or diversion. Nursing staff left controlled substances in unlocked and unattended medication carts and other storage areas. Unauthorized staff (locksmiths, maintenance, pharmacy technicians) had keys to storage areas. Although our testing of inventory reconciliation did not reveal any shortages of controlled substances during the time we were at the facilities, controlled substance inventory records did reveal discrepancies.

Safeguards over controlled substances could be improved. The department needs to ensure any non-functioning locks are repaired and that storage areas comply with federal regulations. Particular attention must be given to ensure all documentation required for controlled substances is properly maintained and nursing staff follow proper procedure in storing, administering, and accounting for them. The department should also take steps to ensure only authorized individuals can access areas where controlled substances are kept. Active monitoring by facility management will help to ensure controls over handling, inventory, and storage of controlled substances are followed.

General Administration

During the course of audit work we identified several areas where general administration of operations could be improved. The following recommendations were made:

- 1. Maintain current photographs of all residents.***
- 2. Ensure facilities have equipment to adequately safeguard and administer medication.***
- 3. Develop a universal set of policies related to physical security and administration of medication at all DPHHS facilities.***
- 4. Develop a plan for periodic inter-facility nurse management meetings.***
- 5. Increase emphasis on supervision of nursing staff responsible for administering and safeguarding medication.***

For a complete copy of the report (01P-11) or for further information contact the Legislative Audit Division at 406-444-3122; e-mail to lad@mt.gov; or check the web site at <http://leg.mt.gov/audit>.