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Owner:	<i>Leonard Rosen: Medical Director</i>
Policy Area:	<i>Medical</i>
References:	

Medication Control

POLICY

It is the policy of Detroit Wayne Integrated Health Network (DWIHN) that medication is managed safely and effectively in accordance with all governing local, State and National laws, rules, regulations and standards.

PURPOSE

The purpose of this policy is to ensure the safety of medication management, including administration, storage, handling, preparation and disposal.

APPLICATION

1. The following groups are required to implement and adhere to this policy: DWIHN Board, DWIHN Staff, Contractual Staff, Clinically Responsible Service Provider (CRSP) and their subcontractors, Specialty Providers, Crisis Services Vendors
2. This policy serves the following populations: Adults, Children, Individuals with Intellectual and/or Developmental Disabilities (I/DD), Serious Mental Illness (SMI), Serious Emotional Disturbance (SED), Substance Use Disorder (SUD), Autism
3. This policy impacts the following **contracts/service lines** : MI-HEALTH LINK, Medicaid, SUD, Autism, Grants, General Fund

KEYWORDS

1. Critical Incident
2. Informed Consent
3. Medication
4. Medication Error

STANDARDS

1. All persons who are eligible for DWIHN-contracted/managed services who have been assessed to have a medical necessity for medications should be offered medications in a manner that assures: consumer choice and involvement via the individual plan of service; consumer education and agreement via a signed informed consent document; medical necessity by adequate clinical documentation of a

consumer's signs and symptoms, past treatment response history, co-occurring medical and substance use disorders and treatments, medication adherence history, and social/environmental supports.

Medication is based on medical necessity and shall not be used as a punishment, for the convenience of staff, or as a substitute for other appropriate treatment.

2. Consideration should be given to a consumer's medication benefits and financial considerations when working on a medication treatment plan with the consumer/guardian. Consumers without medication benefits will be given access to medications via the DWIHN General Fund benefit, as described in the Utilization Management Benefit Policy.
3. DWIHN does not directly deliver any clinical care, however, its delegates, contracted and subcontracted providers are required to have policies, procedures, and monitoring that ensure the following:
 - a. Staff prescribing, handling, and administering medications are appropriately licensed, credentialed, impaneled and trained for their perspective roles. Documentation must be available that demonstrates such training and credentials. For example, staff administering and storing medications in a residential facility must have documented training on file.
 - b. Protocols for storage, preparation and administration of medications which follow community standards for safety. For example, practices which ensure medication is given to the correct consumer, or protocols for monitoring and disposal of medications which have expired. Administration procedures should also include documentation of the administration, the medication's effects and adverse reactions.
 - c. Disposal practices for outdated, unused, discontinued or damaged medications that are compliant with State and Federal requirements.
 - d. Medication error policies and procedures which include Critical Incidents, documentation, analysis and tracking of trends.
 - e. Reporting of medication errors via incident reports is required.
 - f. Protocols for verbal orders which include time frame for signature.

QUALITY ASSURANCE/IMPROVEMENT

DWIHN shall review and monitor contractor adherence to this policy as one element in its network management program, and as one element of the QAPIP Goals and Objectives.

The quality improvement programs of our subcontractors, and direct contractors must include measures for both the monitoring of and the continuous improvement of the programs or processes described in this policy.

COMPLIANCE WITH ALL APPLICABLE LAWS

DWIHN staff, contractors, and subcontractors are bound by all applicable local, state and federal laws, rules, regulations and policies, all federal waiver requirements, state and county contractual requirements, policies, and administrative directives, as amended.

LEGAL AUTHORITY

1. MDHHS-DWIHN Contracts for Medicaid, General Fund and Substance Use Disorders Services
2. Michigan Mental Health Code, P.A. 258 of 1974, as amended
3. Michigan Public Health Code, P.A. 368 of 1978, as amended

4. Michigan Administrative Code, R330.7158
5. Michigan Medicaid Manual

RELATED POLICIES

1. [Behavioral Health Service Medical Necessity Criteria Policy](#)
2. [Benefit Policy](#)
3. [Reporting of Consumer Critical Event, Sentinel Event, and Death Reporting Procedures](#)

RELATED DEPARTMENTS

1. Clinical
2. Clinical Practice Improvement
3. Compliance
4. Customer Service
5. Integrated Health Care
6. Managed Care Operations
7. Quality Improvement
8. Recipient Rights
9. Substance Use Disorders

CLINICAL POLICY

YES

INTERNAL/EXTERNAL POLICY

EXTERNAL

Attachments

No Attachments

Approval Signatures

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