

Observations and Management Action Plans

OBSERVATION ASSESSMENT	OBSERVATION	MANAGEMENT'S RESPONSE
Medium	<p>Observation #2: Inconsistent Documentation of Controlled Substances Administered by External Emergency Medical Service Providers</p>	<p>AGREE (YES/NO): Yes</p>
<p>AREA</p> <p>Pharmacy EMS</p>	<p>OBSERVATION</p> <p>An Emergency Medical Services ("EMS") system is a group of hospitals, vehicle service providers, and personnel that provide pre- and inter-hospital medical care within a geographical region. Illinois state regulations require any hospital in the region with an emergency department ("ED") to replace medication and equipment for EMS providers who deliver patients to its ED. The NM Emergency Management and Safety department manages the relationship with the external EMS providers.</p> <p>External EMS providers, such as ambulance and paramedic services, may administer controlled substances to patients that could result in residual amounts of unused medication. When an external EMS provider brings residual unused medication to a Northwest Region pharmacy, it is disposed of by a pharmacist and an authorized professional. Pharmacy will also provide replacement medication to the EMS provider. The medications administered by external EMS providers should be documented in the patient's Epic medical record and any disposals/replacements of medications should be documented to prevent drug diversion.</p> <p>We reviewed 65 instances where an external EMS provider administered controlled substances to NM patients and noted the following:</p> <ul style="list-style-type: none"> • In 51 instances, the documentation was not included in the patient's medical record. • In 7 instances, medication disposals were not documented by the external EMS provider or Pharmacy. • In 8 instances, the documented medication disposal was inconsistent with the expected residual amount. <p style="text-align: right;"><i>(Continued)</i></p>	<p>RESPONSIBILITY ASSIGNED TO: Cindy Amore, Manager Emergency Management and Safety Erick Borkowski, Pharmacy Director</p> <p>ACTIONS TO BE TAKEN: Management worked with the external EMS providers and updated the electronic documentation form to include a field for documenting disposals.</p> <p>Monthly, management will review a random sample of EMS provider transactions to ensure compliance with procedures and proper tracking of controlled substances. Management will also work with the Pharmacy department to obtain the documentation needed to perform the monthly reviews.</p> <p>TARGET COMPLETION DATE: December 31, 2020</p>

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Medium	<p>Observation #2: Inconsistent Documentation of Controlled Substances Administered by External Emergency Medical Service Providers <i>(Continued)</i></p>	<p>AGREE (YES/NO): Yes</p>
AREA	<p>OBSERVATION <i>(Continued)</i></p> <p>We recommend management:</p>	<p>RESPONSIBILITY ASSIGNED TO:</p> <p>See page 5.</p>
Pharmacy EMS	<ul style="list-style-type: none"> - Revise the documentation requirements for external EMS providers and reinforce the expectation to document administration of controlled substances and disposal of any residual amounts of unused medication and - Perform a monthly review of external EMS provider documentation to monitor for potential drug diversion. <p>IMPACT</p> <p>Inconsistent documentation and monitoring of controlled substances may affect patient safety and result in undetected diversion and possible regulatory risk.</p>	<p>ACTIONS TO BE TAKEN:</p> <p>See page 5.</p> <p>TARGET COMPLETION DATE:</p> <p>See page 5.</p>