


# Nursing Homes and Residential Care settings for older people

– provision of safe and appropriate patient  
care and pharmacy Services

*PSI/ICCPE Joint Initiative*

*Citywest 19th Jan 2012*

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- Legislative Provisions
  - Inspection Process
  - Inspection Process with regard to patients  
in nursing home/residential care settings

# Legislative Provisions

- The Pharmacy Act 2007 gives the PSI significant powers of inspection, investigation and enforcement
- 7 (1) (e) Pharmacy Act:  
“To supervise compliance with this Act and the instruments made under it”
- Part 7 – Powers of Investigation  
Section 67

# Inspection Process

Assess compliance with:

- Pharmacy Act 2007
- Regulations
  - Regulation of Retail Pharmacy Businesses 2008
  - Medicinal Products (Prescription & Control of Supply) 2003 as amended
  - Misuse of Drugs Regulations 1988 as amended
  - European Communities Animal Remedies Regulations 2007 as amended
- Guidance Issued by PSI

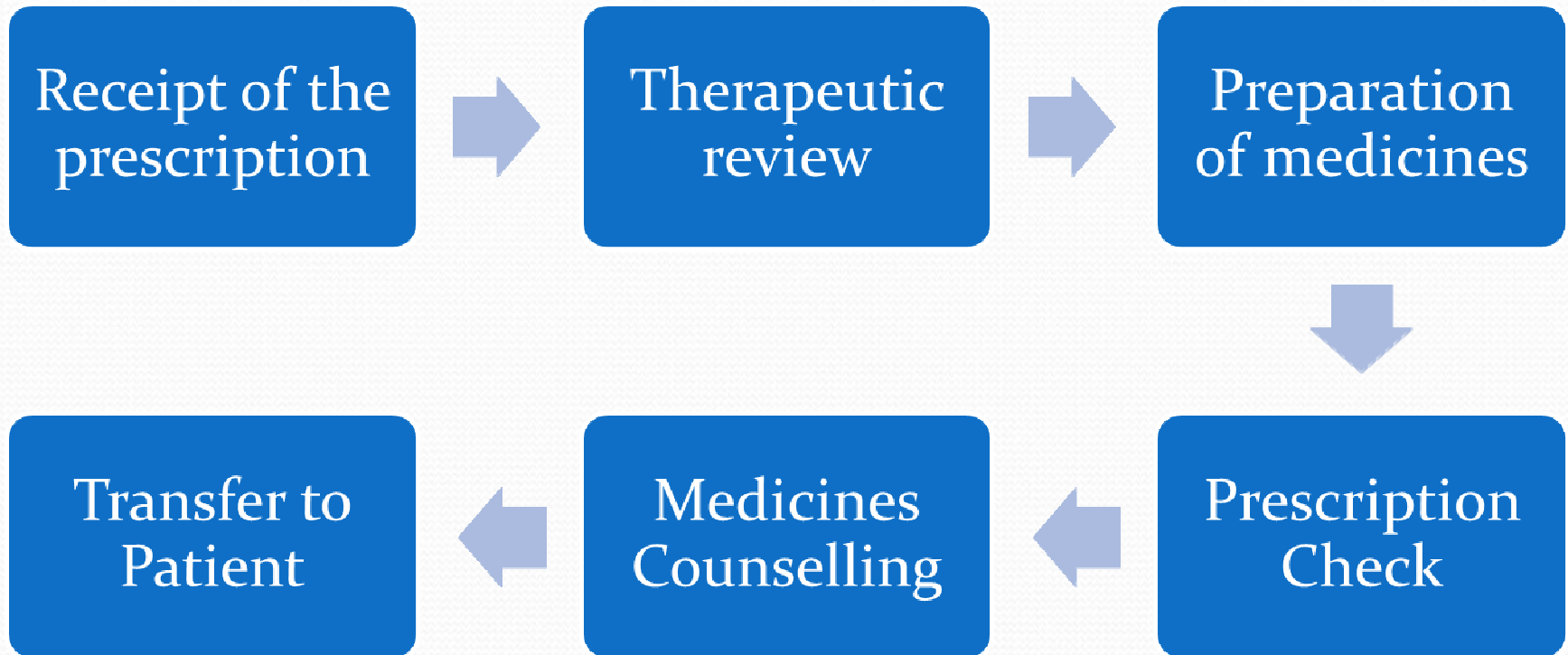
# Inspection Process

- Certificates of Registration
- Policies & Procedures
- Duty Register
- Prescription Register/ Daily Dispensing Report
- Controlled Drugs Register
- Controlled Drugs Inventory
- Controlled Drugs Safe
- Storage of Medicines
- Authorisation of Medicines
- Premises
- Extemporaneous Preparation
- Veterinary Medicines (storage & record keeping)
- Clinical waste management
- **Supply to Nursing Homes/Community Care/ Residential Care Homes**

# Dispensing to Patients in Nursing Homes/Residential Care Centres

- Dispensing Process
- Standard Operating Procedures
- Record keeping

# Same Process For All Patients?



# Receipt of Prescription

- Medicines are dispensed on foot of an original valid prescription
- Controlled Drugs (CD<sub>2/3</sub>) prescriptions are valid (14 days)
- Emergency Supply



# Reminder

- A Faxed prescription is **not** an original prescription
- Kardex is **not** an original prescription
- A medication administration record is **not** an original prescription
- A 'requisition' from a nurse is **not** a prescription/requisition

**Do I ensure that all medicines are dispensed on foot of a valid prescription?**

# Therapeutic Review

- Regulation 9(1) & 9(2) of the Regulation of Retail Pharmacy Businesses Regulations 2008 SI No. 488 of 2008
- Clinical assessment may include
  - screening for any potential drug therapy problems which may arise out of the use of medicines prescribed
  - therapeutic duplication
  - clinical misuse/abuse
  - drug-drug interactions including OTC medicines, food-drug interactions
  - incorrect drug dosage or duration of treatment
  - known drug allergies

**Do I ensure that every prescription is reviewed by a pharmacist for its therapeutic appropriateness for each patient?**

# Preparation of Medicines : Facilities, Equipment, Resources

- Facilities
  - Area for preparation
  - Cleaning Schedule
- Equipment
  - What equipment is in place
    - Manual
    - Automated
  - Maintained/Serviced/Calibrated
- Resources(Pharmacist supervision and Staffing)
  - Pharmacist Supervision
  - Procedures
  - Personnel training

**How do you satisfy yourself that the preparation of medicines is carried out in a way that minimises risk to patient health and safety?**

# Preparation of Medicines: Monitored Dosing Systems

- Suitability of MDS for each Patients
- Stability of all medicines
- Hygiene
- Batch traceability
  - Lot Number & Expiry
  - Date
  - Procedure for recall

**How do you satisfy yourself that MDS is the most suitable method for the Patient.....and not the Nursing Home?**

**How do you satisfy yourself that medicines are suitable for inclusion in MDS systems?**

# Prescription Check

- Number of checks in the process
  - In-process check
  - End-of-process check
- Where is it carried out?
- How many Rx?
- How long (hours)?
- Who does it?
- Who checks the checker?
- Accountability throughout the process?

**How do I design a system of checking that considers and addresses the risk of error?**

# Medicines Counselling

- Regulation 9(3) of the Regulation of Retail Pharmacy Businesses Regulations 2008
- PSI Practice Notice 01/2010
  - How is counselling is provided? What intervals?
  - Records of visits to attend on patients

**How do I ensure that every patient receives the appropriate counselling on the use and storage and all relevant matters relating to the medicines prescribed and dispensed?**

**Do I visit my patients?**

# Transfer to Patient

- Secure
- Maintain medicines stability
- Confidentiality
- Records – Traceability

**How do I ensure that every patient receives the medicines prescribed and dispensed for them?**

**How do I ensure that the quality, safety & efficacy of medicines is not compromised in transit?**

# Standard Operating Procedures

- Written procedures e.g.
  - Authority to supply (including management of Rx changes etc.)
  - Disposal of returned medicines
  - Delivery
  - Counselling
  - Error & Incident management
- Records of all staff training
- Process improvement/Audit

**Are all SOPs are compliant with all pharmacy legislation and current PSI Guidance?**

**How can I assure myself that all staff working in the pharmacy carry out their duties in accordance with the legislation?**

**Do I have a robust Quality System in place?**



# Record Keeping

Records = Legal activity

Records = Proof of an activity

- SOPs
- Patient consent
- Prescription Register
- Records of Delivery
- Records of Visits by the Pharmacist
- Error logs & corrective actions

**How do I manage my dispensing such that I know exactly.....**

- **what I have dispensed?**
- **To whom it was dispensed/delivered?**
- **When it was dispensed?**
- **That it was dispensed in the most appropriate manner for that patient?**
- **That each patient's medicine therapy has been reviewed?**
- **That each patient has received appropriate counselling?**

# Preparation For Inspection

- Self – Audit/Self Assessment Tool
- [thepsi.ie](http://thepsi.ie)
- [info@thepsi.ie](mailto:info@thepsi.ie)



Thank You