

# IMPLEMENTATION OF POLICIES RELATED TO INCIDENTAL MEDICAL SERVICES (IMS) (Updated 8/7/2015)

---

## OVERVIEW

What has changed?

- No longer require an exception to perform some IMS
- The Plan of Operation for CCC will be more detailed (if the CCC chooses to provide IMS)
- FCCH will now be required to submit a Plan for Providing IMS (if they choose to provide IMS)
- IMS policy has been expanded to include Carrying Out the Medical Orders of a Child's Physician (which includes administration of insulin injections, emergency anti-seizure, and other IMS)

What are IMS?

- Blood glucose monitoring
- Administering inhaled medication
- Administering Epi-Pen and Epi-Pen Jr
- Administering glucagon
- Administering gastrostomy tube feeding and care
- Carrying out medical orders when the child's physician has determined that a layperson can be trained and safely carry out the orders

Are medications always included as part of IMS?

- Medication may be included as part of IMS if it is included in the physician's orders, i.e., Epi-pen, inhaled medications, glucagon.
- Prescription medications that do not require training to administer and all non-prescription medications are not considered IMS, i.e., antibiotics, Tylenol, etc.

What are the LPA's required to do during visits?

- Discuss IMS policy and ask if any IMS are being provided. Document discussion.
- If IMS are being provided, do the following:
  - Check to ensure the facility meets the requirements for providing IMS:
    - review the storage of medication and equipment/supplies
    - check the records of the individual children being provided the IMS for required documentation (document using LIC 857-Children's Records Review)
    - interview staff
    - check staff records for written verification of training (document using LIC 859-Review of Staff Records)
    - verify that at least one trained staff member is available to provide the IMS whenever the child needing IMS is in care

## IMPLEMENTATION OF POLICIES RELATED TO INCIDENTAL MEDICAL SERVICES (IMS) (Updated 8/7/2015)

---

- cite the appropriate law or regulation for any violations found. (See charts provided at training)
- For CCCs: If IMS is not already in the Plan of Operation, cite 101173(c) (a Type B violation), give a 30-day POC due date, and require an updated Plan of Operation that includes IMS. Go over the specifics for the plan with the licensee (CCC EM Policy -101173).
- For FCCHs: If the facility does not already have a Plan for Providing Incidental Medical Services, cite Health and Safety Code section 1597.54(h) (a Type B violation), give a 30-day POC due date, and require a Plan for Providing IMS. Go over the specifics for the plan with the licensee (FCCH EM Policy – 102417).

*NOTE: The purpose of the “Plan” is to ensure the facility has all the safeguards in place so they can provide the IMS in the safest manner possible.*

- Use the following canned language on the LIC 809: “This facility provides Incidental Medical Services – IMS. LPA reviewed storage of medication and equipment/supplies, and reviewed children’s, personnel, and administrative records.”
- Document additional information on an LIC 812

What are the LPAs required to do when the IMS “Plan” is received?

- Review the plan to ensure it meets all of the elements outlined in EM Policy (CCC-101173 or FCCH-102417)
  - If corrections are needed, contact the applicant/licensee, provide technical assistance, and request the corrections or additional information needed.
- Document the review of the plan on an LIC 812 and name the document “IMS-PO”. Include, in the documentation, the types of IMS the licensee plans to provide.
- File in hard copy facility file as well as FAS.
- At the next facility visit, review to ensure the facility is following its plan.

What are LPAs required to do with applications that do not include IMS in the Plan of Operation (CCC) or a Plan for Providing Incidental Medical Services (FCCH)?

- Contact applicant to discuss new policy.
  - If they do not wish to provide IMS, document, and continue processing the application.
  - If they do wish to provide IMS, direct them to the appropriate EM Policy section (CCC-101173 or FCCH-102417) for plan requirements. Request the plan.
    - Do not hold up the application.
    - Upon receipt of the plan, follow the review process above.