



MEDICATION PASS: DIETARY SUPPLEMENTS, NATURAL PRODUCTS, VITAMINS, HERBALS

Department of Health Services / Division of Quality Assurance
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HANDLING MEDICATION PASS

The State Operations Manual (SOM) states:

Nutritional and Dietary Supplements

Nutritional Supplements are medical foods that are used to complement a resident's dietary needs. Examples of these are total parenteral products, enteral products, and meal replacement products (e.g., Ensure, Glucerna, and Promote).

Herbal and alternative products are considered to be dietary supplements. They are not regulated by the Food and Drug Administration (e.g., they are not reviewed for safety and effectiveness like medications) and their composition is not standardized (e.g., the composition varies among manufacturers). If a dietary supplement that is given to a resident between meals and has a vitamin(s) as one or more of its ingredients, it should be documented and evaluated as a dietary supplement, rather than a medication. For clinical purposes, it is important to document a resident's intake of such substances elsewhere in the clinical record and to monitor their potential effects, as they can interact with other medications.

NOTE: Because nutritional and dietary supplements are not considered to be medications for purposes of the medication administration observation, noncompliance with the administration of these products should not be included in the calculation of the facility's medication error rate at F759 or as a significant medication error at F760. Medication errors involving vitamins and/or minerals should be documented at F759 and counted towards the error rate calculation. Medication errors involving vitamins and minerals would not be considered to be a significant medication error unless the criteria at F760 were met.

It is expected that the facility staff, along with the prescriber and consulting pharmacist, are aware of, review for, and document any potential adverse consequences between medications, nutritional supplements, and dietary supplements that a resident is receiving.

GENERAL GUIDELINES

Medication errors involving vitamins and/or minerals should be documented at F759 and counted towards the error rate calculation.

- If the product is a single mineral (e.g., zinc, iron, potassium, sodium, calcium), these are counted in med pass.
- If the product is a single vitamin (e.g., vitamin c, vitamin e, vitamin d,), these are counted in med pass.
- Combination products (e.g., multivitamin with or without minerals) should be counted in med pass.
- Combination products that are for a specific condition (e.g., vision, prostate) should not be counted in med pass. (See below.)

The inclusion of a product is based only on its FDA classification. It does not matter if the product is clinically needed, care planned, or if there is a specific order. The only factor for inclusion of a product during medication pass task is its classification as a medication.

COMMONLY USED PRODUCTS TO EXCLUDE FROM MEDICATION PASS OBSERVATION

This list was compiled by reviewing med pass forms from surveys conducted in 2016.

- Acidophilus
- Acidophilus / Pectin
- Cranberry
- Culturelle
- Fish Oil
- Omega 3 / Fish Oil
- Florigen
- Glucosamine
- Ivite
- Lactaid
- Lactase Enzyme
- Melatonin
- Nephro Aide
- Probiotic
- ProMod
- Propass Powder
- Prosight
- Saw Palmetto

COMMONLY USED PRODUCTS TO EXCLUDE DURING MEDICATION PASS TASK

- **All glucosamine/chondroitin products** – Used for arthritic pain
- **All melatonin products** – Used for sleep
- **All probiotic formulations** – Used to protect digestive tract from antibiotics
- **All cranberry formulations** – Used to prevent urinary tract infections
- **All fish oil formulations** – Oils for cardiac health
- **Eye vitamin supplements** – ProSight and Ivite (when you see a list of different ingredients and labeling that suggests eye function support)
- **Supplements for prostate** – There are drugs like finasteride, terazosin, dutasteride, and tamsulosin that would be included in med pass. However, do not include saw palmetto, beta prostate, and other prostate health products where the label indicates that the product consists of a combination of many items.
- **Herbals** – When you hear the term “herbal” or “herbal supplement,” do not include (e.g., ginseng, ginkgo, St. John’s wort, turmeric, cinnamon, rosemary, ginger, garlic).