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To: Hospitals HOSP 04

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Medication Cart Storage in Hospitals: Secured and Locked

Background

In November 2006, hospital regulations related to medication security were updated. This update relaxed the requirements for all medications to be locked at all times. The regulations now require medications to be kept in a secure area and locked when appropriate.

In February of 2008, the Centers for Medicare and Medicaid Services (CMS) issued guidance related to locking and securing medications. The attached regulations and associated guidance include the provisions for locking and securing medications in hospitals and critical access hospitals. See sec. 42 CFR 482.25(b)(2)(i) and for critical access hospitals, see also 42 CFR 485.635(a)(3)(iv).

A considerable portion of the guidance addresses medication carts, which includes crash carts and anesthesia carts. The guidance and CMS comments published in the *Federal Register* relating to this issue recognize that during patient care activities the carts will not be locked. In addition, due to patient care needs it would be inappropriate for crash carts and anesthesia carts to have a traditional key lock for fear that the key would not be available when a patient urgently needed the medications stored in the cart. The guidance is clear, however, that when a medication cart is not in a secure location, the cart must be locked. While the regulations recognize that immediate access is necessary to meet patient safety needs, accessibility must be balanced against potential access to unsecured medications. Patients are placed at risk when the medications needed for an emergency have been removed or are unusable because of tampering.

Position

Recently there have been a number of citations for unsecured medications. In these situations, a plastic breakaway lock was utilized to lock medication carts stored in unsecure areas. A plastic break away lock does not adequately lock a medication cart.

A properly secured medication cart must meet **one** of the following conditions:

- 1) A permanent key lock such as: key pad, biometric or similar permanent locking system must be used, or
- 2) The cart can be placed in a locked room when authorized staff are not present, or
- 3) The cart can be placed in a secure area where staff is present.

In most areas where crash carts and anesthesia carts are stored, staff is present and actively providing patient care. In this situation staff can monitor the carts, thereby meeting the requirement for a secured medication cart. However, surveyors have observed crash carts and other medication carts pushed into alcoves, stored in patient rooms, or stored in unlocked departments where staff are not present (OR Suites, Radiology, etc). Unlocked medication carts in exam rooms where patients are left unattended or unsupervised for a period of time provide another example of unsecured medication carts. In these instances, the carts are not permanently locked, not in a locked room, and since staff is not present, the medications are not secured.

The use of break away locks, exchangeable trays with sealed plastic and other tamper proof devices are valuable tools to alert staff to tampered medication carts. However, these devices do not ensure security of the medications within them.

Attachments

Hospital Conditions of Participation

http://cms.hhs.gov/manuals/Downloads/som107ap_a_hospitals.pdf

Critical Access Hospital Conditions of Participation

http://cms.hhs.gov/manuals/Downloads/som107ap_w_cah.pdf