**Guidance for Controlled Medication Counts**

This guidance is intended for facilities where two nurses are not available to do a narcotic count yet a count for verification must be completed.

The first choice and best practice would be a nurse-to-nurse count at the end of each shift. However, this is not always possible or practical in Assisted Living facilities. In these circumstances, it is allowed that the two people counting the controlled substances be:

* Nurse to CMA
* CMA to CMA
* In the event that there are just CNAs or no overnight coverage, the last CMA or Licensed Nurse to have access to the narcotics must make sure that all narcotics are double locked and there will be no access to narcotics. A system must be in place to verify the narcotic count when another CMA or Licensed Nurse returns.

The licensed nurse must:

* Have an audit system in place where verification is made by a nurse confirming that the counts are being completed and are accurate. Example would be the nurse coordinator audits counts weekly.
* Have a procedure in place that if a count discrepancy occurs in the change of shift verification, an investigation is made immediately to determine the error by the staff person associated with the medication delivery system. If there was no CMA or Licensed staff to complete a shift verification, policies must be in place regarding how the facility will verify the narcotic count upon return of the CMA or Licensed Nurse and a procedure for any discrepancies.

If a count cannot be reconciled:

* Anyone associated with the administration or assistance of medication may not leave the facility. When the verification is completed upon the arrival of the CMA or Licensed Nurse as the prior shift was a CNA or no coverage, the last person having access to the narcotics will be called in. Only the charge nurse or Administrator may dismiss the staff person involved in the controlled medication count if a count discrepancy occurs.
* The on call nurse will be notified if needed.
* They must document on a Medication Error /Discrepancy Report and report any discrepancies to the Director of Nursing Services.

**AT NO TIME SHOULD CNAs OR OTHER STAFF HAVE ACCESS TO CONTROLED SUBSTANCES WITHOUT A LICENSED NURSE OR CMA.**

**All of these items must be addressed in the policies and procedures of the facility**