

## CHALLENGE TO JOINT COMMISSION CITATION

**Note: This challenge successfully overturned the citation given during a September 2009 survey.**

### INDIRECT IMPACT STANDARD

**Chapter:** Medication Management

**Program:** Hospital Accreditation

**Standard:** MM.01.01.03

**Standard Text:** The hospital safely manages high-alert and hazardous medications

**Element of Performance:** (2) The hospital has a process for managing high-alert and hazardous medications. (See also EC.02.02.01, EP 8, MM.03.01.01, EP 9).

**Scoring Category:** A

**Score:** Insufficient compliance

**Observation(s):** EP2

Observed in the medication management session at the Southeast Louisiana Hospital site.

Condition of Participation does not apply to this observation.

Staff reported that there is no policy requiring a second person check the dose and type of insulin prior to administration, despite its having been classified as a high risk medication with dispensing and administration being specifically identified as “high alert features”.

Rebuttal:

This is a category A element of performance that requires a process for the management of high-alert medications. The Joint Commission standard is not prescriptive as to the approach that is taken and does not specify the medications or the strategies that must be identified.

Southeast Louisiana Hospital has both a process and a written policy on the management of high risk-high alert medications. Hospital policy #Tx.3-1300 identifies seven (7) medications as high risk/high alert – one of which is insulin. In accordance to standard, this policy identifies specific risk reduction strategies and these are in effect. For insulin, these risk reduction strategies include the following measures:

- “Unit” is to be written out in the medication order,
- Use of trailing zero is not permitted in the order,
- Varying formulations of insulin are segregated in the refrigerator,
- Vials sent for pass are destroyed upon return to the hospital,
- Insulin concentrations are standardized,
- There is a diabetic management hypoglycemic protocol.

Therefore, we have a policy with the required elements of performance, as required by the standard, and we are in compliance with our policy. In addition, our automated medication management system has an additional safeguard incorporated into the segregation of insulin in the refrigerator. The Pyxis screen specifies high alert agent and designates an insulin specific box number. The insulin container box then has a high alert agent label with the correlated box number.