



HEADQUARTERS, TASK FORCE TORCH

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NGCA-YCZ

8 September 2024

MEMORANDUM FOR Task Force Torch ChalleNGe Academies

SUBJECT: Medication Administration and Oversight Policy

1. References.

- a. Task Force Torch Policy: Medication Administration Oversight, dated 20 March 2024.
- b. CNGBM 9350.01 National Guard Youth Challenge Program, dated 22 March 2023.
- c. California Department of Education: Program Advisory on Medication Administration


2. This policy memorandum supersedes the above policy, reference a. and is effective immediately.

3. Purpose: This policy memorandum establishes the standards for the administration and oversight for medications at all California Youth Challenge programs. To comport with this policy, it is imperative that all Cadre members understand who may administer medications and understand the conditions and requirements for their storage, delivery, administration, documentation, and disposal. Academies will update processes and Standard Operating Procedures or manuals, accordingly, incorporate direct leadership involvement/oversight, conduct initial and refresher training, utilize a medications log and monitor and report medication administration, store all medication in accordance with labelling and in a manner to prevent misuse, and establish internal controls to ensure the integrity and quality of their medication administration and oversight program. Any errors in medication administration will be reported in accordance with academy and National Guard Bureau policy and within 24 hours of the error occurring.

4. In accordance with this policy, utilize the attached medication administration guide.

5. The point of contact for this memorandum is LTC Nathan Lavy at (916) 233-6234 or email at nathan.t.lavy.mil@army.mil or nathan.lavy@cmd.ca.gov.

Encl
Medication Admin & Oversight Guide


PETER B. CROSS
Brigadier General (CA)
Commanding

Task Force Torch Medication Administration and Oversight Policy Guide

1. References.

- a. California Education Code Section 49423 – Assisting Pupils in Self-Administration
- b. California Education Code Section 48980 – Notification of Parent Rights
- c. California Education Code Section 49480 – Parent Responsibility and School/Physician Communication
- d. California Administration Code Title 5, 18170 – Agency/District Provisions

2. Purpose. The purpose of this guide is to establish guidelines and procedures for providing medications to cadets attending ChallenNGe Academies and to ensure that they are in compliance with the State of California Education Code and CNGBM 9350.01. The word “cadet” is used when referring to candidates/cadets/scholars alike. The phrase “non-medical staff or staff” is used when referring to cadre/staff/unlicensed personnel/non-health professional alike.

3. Medication Storage:

- a. Only medication provided by a cadet’s parent or guardian pursuant to a prescription by a medical professional will be stored and administered.
- b. Immediately upon in-take day all candidate cadet prescriptions are verified by prescription label and turned into medical staff. Medication distribution sheets are created and will contain full name of candidate, name of medication, dosage amount, and frequency.
- c. All medications are secured behind an electronic combination locked door that only authorized medical staff have access to.
- d. Medications that require refrigeration are also locked in the same room and kept in a temperature-controlled refrigerator.
- e. Under special circumstances, designated candidates/cadets are authorized to be in possession of their prescribed medication (inhalers, creams, etc.) once verified and cleared by the medical staff. These items will be labeled with the cadet’s name and platoon.
- f. Cadets that bring a prescribed EpiPen will have that EpiPen with that platoon at all times. The pen is hand receipted over to the platoon sergeant and the platoon is responsible for bringing it to wherever the platoon goes. Accountability of EpiPen is maintained by platoon leadership. Academy medical OIC/NCOIC or designated medical professional will conduct random spot checks throughout the cycle.

4. Medication Administration:

Task Force Torch Medication Administration and Oversight Policy Guide

a. California Administration Code, Title 5, 18170, includes medication administration in the implementation of a health services program. Medication can be administered in a school/Academy setting by a licensed health professional, a contracted licensed health care professional whose licensure permits administration of the medication, or by the student under specified conditions, or a designated non-health professional (cadre/staff member, etc.) trained by Academy medical staff. Cadets are not authorized to be in possession of any controlled medications at any time.

b. Unlicensed academy personnel designated by the site administrator/medical staff can administer medication if:

(1) It is documented within their duty requirements and a parental power of attorney is in place for each cadet.

(2) The unlicensed staff member is trained annually (within 30 days of start for new hires) and determined to be capable and competent to be able to safely and accurately administer the medication by a licensed health care professional or Medical NCOIC/OIC (with concurrence by a licensed health care professional), who is legally authorized to provide such training and determined competent.

(3) The unlicensed staff member performing medication administration is operating within the supervision of the licensed health care professional who provided the training. This supervision isn't intended to be 24/7 physical oversight. The supervision, review, and monitoring of the medication administration will be documented.

(4) The unlicensed staff member does not administer medications that must be administered by injection, medications that have potential for immediate severe adverse reactions, or medications that require a nursing assessment or dosage adjustment before administration, except for emergency medications as allowed by law.

(5) The unlicensed staff member designated to administer life-sustaining emergency medication as allowed by law receives documented training and maintains current certification in cardiopulmonary resuscitation (CPR) from a recognized source of such training, such as the American Red Cross or the American Heart Association

(6) Whenever practical, licensed medical personnel will administer medications. Training of the academy staff/cadre in "assisting" the cadets with self-administration is the responsibility of qualified medical staff. Upon completion of the training the academy staff will:

- Understand the legal statutes including proper storage and prescriptive requirements.
- Be able to demonstrate administration procedures for oral, topical, inhalant, eye, ear, and emergency medications.
- Use resources correctly, including seeking guidance from medical staff when uncertain about medications.
- Follow individual school/Academy/district policy and procedures.

Task Force Torch Medication Administration and Oversight Policy Guide

(7) Medical staff will assess academy personnel's understanding of medication being dispensed on a random and routine basis. Questions may be asked regarding procedures and protocols. Medical staff will provide additional training as needed.

c. All staff members are required to adhere to the following procedures when administering medications:

(1) For each medication distributed, ensure that the medication sheet(s) has the following information:

- Cadet's full name
- Current Month and Year
- Platoon
- Medication name, name and telephone number of the proscribing health care provider
- Dosage (the amount of the medication to be administered, the method by which the student is to receive the medication, time the medication is to be administered)
- Start and end dates
- Cadet signature, academy medical professional/staff signature

(2) Ensure each cadet takes the medication and does not pocket it or try and hold onto it for improper use (giving it to other cadets, misuse, etc.). Proper procedure includes having cadet display the pill on their tongue and then showing you the inner parts of their cheeks and under tongue after consumption.

(3) Once cadets have taken their medication they will initial or sign their individual sheet to confirm that they have received their medications. Supervising cadre will sign the distribution sheet for accountability purposes. Filled Cadets' medication sheets will be placed in their individual file at the completion of every month or once the medication regimen is complete. Completeness of all files will be reviewed by the medical OIC/NCOIC and reported to the commandant.

(4) If a cadre forgets to pass out a medication it will be reported to the commandant, platoon sergeant, academy director and medical OIC/NCOIC.

(5) Any failure to properly administer medication according to the written statement of the authorized health care provider, including the administration of the wrong medication or the failure to administer medication, will be reported immediately upon discovery to the platoon sergeant, commandant, and medical OIC/NCOIC or other duly qualified supervisor of health, director and parent or guardian as necessary. Medication errors include:

- Medication given to the wrong student
- The wrong medication given to a student
- The wrong medication dose given to a student
- Medication given at the wrong time
- Medication given by way of a wrong method or route

Task Force Torch Medication Administration and Oversight Policy Guide

- Medication omission
- Medication dropped on the floor and discarded

(6) Academy medication policies will include procedures for immediate medical assistance, if needed.

(7) Cadets are not forced to take their medication. If a cadet refuses to take their medication, the staff member will annotate in the notes section on the medication sheet and will notify the platoon leadership. Refused meds **MUST** be reported to the medical staff as it may cause health concerns and must be rapidly addressed. Refusal should be reported to their parent or guardian.

(8) Staff members will not deny a cadet their medication or influence a cadet to stop taking medication. If a staff member believes a cadet should not be on certain medication, they may refer the matter to the medical staff. Only an authorized licensed healthcare provider (doctor, nurse practitioner, etc.) with parent or guardian consent can authorize a cadet to stop taking their prescribed medication.

(9) Any errors discovered once a cadet has taken any medication will be immediately reported to medical staff. The candidate/cadet will be closely monitored for 4 hours (or longer as necessary) to ensure that there are no adverse reactions. If reaction is observed, then medical staff will transport the cadet to the nearest emergency department so that treatment can be provided. If occurrence happens off post, then medical staff will be contacted in order to provide medical direction to on shift cadre. If the reaction is significant then cadre will activate the local Emergency response system before contacting medical staff to accelerate lifesaving treatment.

(10) Medical staff are responsible for delivering medication storage containers/boxes to each platoon at specified times throughout the day and/or weekends. Academies will publish an SOP for the composition and handling of containers/boxes. Boxes will remain secured with designated combination lock and secured in a location as directed by the site director and medical staff when not in use.

(11) During weekends or field trips, academy leaders will plan for trained staff to be present, and the medication storage box will be physically transferred between the oncoming and outgoing staff members. Storage and handling must be documented and secured in accordance with SOP consistent with the requirements of this guide and law. Medication will be stored in prepared individual containers and clearly labeled. Only designated trained personnel will keep stored medication. Medication logs will be maintained, and staff will ensure medication confidentiality (for example, protecting data or information as its shared by limiting access).

(12) Common over the counter (OTC) medications can only be given with prior documented authorization and parent/guardian consent and must be stored in their original container and administered to the same standard as any other prescribed medication. Before providing these medications, designated trained cadre must first assess the appropriateness of the situation, and will consult with medical staff or on call medical professionals as necessary. Medical staff must periodically review or assess if

Task Force Torch Medication Administration and Oversight Policy Guide

cadets continually request OTC medication.

(13) As a rule, any medication not meeting legal requirements will be sent home, or be properly disposed of. Parents need to be contacted by phone to review policy and to make further arrangements. Examples include mislabeled or expired medications.

d. Medication Refills:

(1) Upon in-take, cadre/medical staff should ensure that medication is properly stocked or refilled. As a best practice, programs should plan so as to limit reliance on and frequency at pharmacies. Cadet's medication should be transferred to a local pharmacy for refill purposes. If not transferred, medical staff will call the parents/guardians 10 days before the medication runs out.

(2) When a cadet family member provides a refill of medication, the medication date, dose, and frequency will be verified. Any change in dose must be accompanied by a note of the prescribing Doctors office in the official letterhead for that office with the Doctor's signature. The note will be added to cadets medical file and an email of dose change will be sent to the platoon leader/counselor, platoon sergeant and case manager. If it is a behavior altering medication then the school counselor will be included in the email.

(3) Academies should not collect money from primary guardian/parents for co-pays. Cadre and staff will communicate with parents to pay for medication refills by contacting the pharmacy directly. For academies with a 501(c)(3) involved in medication refills, the academy must have documented procedures in their medical SOP which include financial activities by cadre (like a bank card use), receipt accountability, and expense ledgers kept in the cadets file and process for submitting documentation to the 501(c)(3) at the end of each cycle.

(4) If unable to contact the primary guardian/parent to request medication refills, medical staff will notify the platoon leaders/counselors and/or case manager to assist with contacting the guardian to limit the chances of cadets missing a dose.

(5) All medications received will be annotated by medical staff in the cadet's chart for documentation purposes.

e. At the end of the school/class year/cycle, all the remaining medication is returned to cadet' parents or guardians by the military staff-counselor, Platoon Sergeant, case manager, or cadre and documented on the cadet's medication log with the name and date of academy personnel. Parents will sign that they received the medication on a Release Form.