

	MENTAL RETARDATION BULLETIN COMMONWEALTH OF PENNSYLVANIA * DEPARTMENT OF PUBLIC WELFARE	
	SUBJECT PRO RE NATA MEDICATION USAGE FOR PSYCHIATRIC TREATMENT - CLARIFICATION OF INTERPRETATION	BY  Nancy R. Thaler Deputy Secretary for Mental Retardation
NUMBER:	00-02-09	
ISSUE DATE:	July 11, 2002	
EFFECTIVE DATE:	Immediately	

SCOPE:

Community Homes for Individuals with Mental Retardation Directors
 Adult Training Facility Directors
 Family Living Home Agency Directors
 County Mental Health/Mental Retardation Administrators

PURPOSE:

The purpose of this Bulletin is to clarify the interpretations in the Licensing Inspection Instrument for Community Homes for Individuals with Mental Retardation, the Licensing Inspection Instrument for Family Living Homes, and the Licensing Inspection Instrument for Adult Training Facilities relating to the use of Pro Re Nata (PRN) medications to treat episodically occurring symptoms of a psychiatric disorder and not simply for behavior control; and to ensure the appropriate use of PRN medications in the mental retardation community by establishing guidelines.

BACKGROUND:

The Office of Mental Retardation is providing clarification on the use of PRN medication related to the psychiatric treatment of individuals living in facilities licensed by the Office of Mental Retardation. The clarification is necessary to eliminate confusion in the mental retardation community that has occurred with the present interpretation listed in the Licensing Inspection Instrument for Community Homes for Individuals with Mental Retardation, the Licensing Inspection Instrument for Family Living Homes, and the Licensing Inspection Instrument for Adult Training Facilities.

DISCUSSION:

Current promising practice for psychiatric treatment includes usage of PRN's for certain syndromes. With certain syndromes, PRN's may be the least restrictive method. Appropriate use of PRN medication may reduce the potential for side effects; may reduce the tendency to obtain a physical tolerance to the medication (requiring a higher dosage); may reduce the need for psychiatric hospitalization; and may reduce the use of restrictive procedures by appropriately treating the underlying syndrome. The Office of Mental Retardation is reiterating that PRN's may be used when the proper guidelines are in place.

APPLICATION OF CLARIFICATION:

The Office of Mental Retardation is clarifying the interpretations of the mental retardation regulation subsections by including additional interpretation to the following:

- Chapter 6400.199(e)**
- Chapter 6500.169(d)(3)**
- Chapter 2380.159(d)**

Is a Pro Re Nata (PRN) order for controlling acute, episodic behavior ever administered?

- Chapter 6400.199(k)**

Is there documentation of compliance with subsection §6400.199(b) - (i)?

Chapter 6500.169(j)

Is there documentation of compliance with subsection §6500.169(b) - (h)?

Chapter 2380.159(j)

Is there documentation of compliance with subsection §2380.159(b) - (i)?

CLARIFICATION:

Attached are the additional interpretations that may be inserted into each respective section of the regulation subsections listed above, under the heading of Restrictive Procedures in the Licensing Inspection Instrument for Community Homes for Individuals with Mental Retardation, the Licensing Inspection Instrument for Family Living Homes, and the Licensing Inspection Instrument for Adult Training Facilities.

§2380.159(d) Is a Pro Re Nata (PRN) order for controlling acute, episodic behavior ever administered?

Application: PRN means, "as needed" and includes a drug, which is ordered on an "as needed" basis for controlling acute, episodic behavior that restricts the movement or function of an individual.

Medications prescribed on a PRN basis for the treatment of episodically occurring and well-defined symptoms of an underlying disorder (such as an anxiety disorder, auditory hallucinations, etc.) and not simply for behavior control, are not considered chemical restraints and therefore are not prohibited. A PRN medication is permitted if the physician documents a very clear description of the explicit psychiatric symptoms of the mental illness. In summary, a PRN medication is permitted to treat a specific diagnosed condition or illness, but not for behavior control that is absent a related psychiatric diagnosis.

Regional licensing staff shall review the provider's clinical records for any pattern of potential violations of this requirement. If the OMR Regional licensing staff is uncertain about the clinical diagnosis or the reason for the PRN medication (treatment of mental illness versus behavior control) the licensing staff shall contact the OMR clinician for advice and technical assistance.

§2380.159(j) Is there documentation of compliance with §2380.159(b) - (i)?

To ensure compliance with §2380.159(d) and to exhibit that the purpose of the PRN is to clarify whether the PRN is being used to treat an episode of a known illness or is the PRN being used as chemical relief, the following guidelines must be followed:

1. Confirmed documentation by a physician or medical practitioner of the individual's mental illness diagnosis shall be present in the individual's record.
2. Written instructions by a physician or medical practitioner listing the individual's specific mental illness symptoms that would warrant the use of a PRN psychotropic medication shall be included in the physician's prescription of the medication.
3. Prescribed directions on the pharmacy label shall include frequency (dose and allowable rate of recurrence of dosage) for administration of the PRN.
4. Authorization by the CEO or CEO's designee for each instance of administration of a PRN psychotropic medication shall be documented in the applicable medication log.
5. Monitoring as indicated by a physician or medical professional and as directed on the pharmacy label of the actual response to medication each time a PRN is administered shall be documented in the individual's record.

§6400.199(e) Is a Pro Re Nata (PRN) order for controlling acute, episodic behavior ever administered?

Application: PRN means, "as needed" and includes a drug, which is ordered on an "as needed" basis for controlling acute, episodic behavior that restricts the movement or function of an individual.

Medications prescribed on a PRN basis for the treatment of episodically occurring and well-defined symptoms of an underlying disorder (such as an anxiety disorder, auditory hallucinations, etc.) and not simply for behavior control, are not considered chemical restraints and therefore are not prohibited. A PRN medication is permitted if the physician documents a very clear description of the explicit psychiatric symptoms of the mental illness. In summary, a PRN medication is permitted to treat a specific diagnosed condition or illness, but not for behavior control that is absent a related psychiatric diagnosis.

Regional licensing staff shall review the provider's clinical records for any pattern of potential violations of this requirement. If the OMR Regional licensing staff is uncertain about the clinical diagnosis or the reason for the PRN medication (treatment of mental illness versus behavior control), the licensing staff shall contact the OMR clinician for advice and technical assistance.

§6400.199(k) Is there documentation of compliance with 199(b) - (i)?

To ensure compliance with §6400.199(e) and to exhibit that the purpose of the PRN is to clarify whether the PRN is being used to treat an episode of a known illness or is the PRN being used as chemical relief, the following guidelines must be followed:

1. Confirmed documentation by a physician or medical practitioner of the individual's mental illness diagnosis shall be present in the individual's record.
2. Written instructions by a physician or medical practitioner listing the individual's specific mental illness symptoms that would warrant the use of a PRN psychotropic medication shall be included in the physician's prescription of the medication.
3. Prescribed directions on the pharmacy label shall include frequency (dose and allowable rate of recurrence of dosage) for administration of the PRN.
4. Authorization by the CEO or CEO's designee for each instance of administration of a PRN psychotropic medication shall be documented in the applicable medication log.
5. Monitoring as indicated by a physician or medical professional and as directed on the pharmacy label of the actual response to medication each time a PRN is administered shall be documented in the individual's record.

§6500.169(d)(3) Is a Pro Re Nata (PRN) order for controlling acute, episodic behavior ever administered?

Application: PRN means, "as needed" and includes a drug, which is ordered on an "as needed" basis for controlling acute, episodic behavior that restricts the movement or function of an individual.

Medications prescribed on a PRN basis for the treatment of episodically occurring and well-defined symptoms of an underlying disorder (such as an anxiety disorder, auditory hallucinations, etc.) and not simply for behavior control, are not considered chemical restraints and therefore are not prohibited. A PRN medication is permitted if the physician documents a very clear description of the explicit psychiatric symptoms of the mental illness. In summary, a PRN medication is permitted to treat a specific diagnosed condition or illness, but not for behavior control that is absent a related psychiatric diagnosis.

Regional licensing staff shall review the provider's clinical records for any pattern of potential violations of this requirement. If the OMR Regional licensing staff is uncertain about the clinical diagnosis or the reason for the PRN medication (treatment of mental illness versus behavior control) the licensing staff shall contact the OMR clinician for advice and technical assistance.

§6500.169(j) Is there documentation of compliance with §6500.169(b) - (h)?

To ensure compliance with §6500.169(d)(3) and to exhibit that the purpose of the PRN is to clarify whether the PRN is being used to treat an episode of a known illness or is the PRN being used as chemical relief, the following guidelines must be followed:

1. Confirmed documentation by a physician or medical practitioner of the individual's mental illness diagnosis shall be present in the individual's record.
2. Written instructions by a physician or medical practitioner listing the individual's specific mental illness symptoms that would warrant the use of a PRN psychotropic medication shall be included in the physician's prescription of the medication.
3. Prescribed directions on the pharmacy label shall include frequency (dose and allowable rate of recurrence of dosage) for administration of the PRN.
4. Authorization by the CEO or CEO's designee for each instance of administration of a PRN psychotropic medication shall be documented in the applicable medication log.
5. Monitoring as indicated by a physician or medical professional and as directed on the pharmacy label of the actual response to medication each time a PRN is administered shall be documented in the individual's record.

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:

Appropriate Regional Mental Retardation Program Managers