Q/A - Regulatory Clarifications – April 2015

The clarifications and interpretations below will remain on the Department’s web site until the information is included in the next updated Regulatory Compliance Guide (RCG).

Regulation: § 3800.143(d) – Child Health Examination

§ 3800.143(d) - The health examination shall be completed, signed and dated by a licensed physician, certified registered nurse practitioner or licensed physician’s assistant. Written verification of completion of each health examination, date and results of the examination, the name and address of the examining practitioner and follow-up recommendations made, including each component, shall be kept in the child’s record.

Question: Is a facility permitted to fill out any portions on the child health examination form?

ANSWER: Facilities are permitted to fill out only the special health or dietary needs of the child, allergies or contraindicated medications, and physical or mental disabilities of the child, if any, on the child health examination form. Facilities are PERMITTED to do the following:

- Complete a specific portion of the child health examination form such as the special health or dietary needs of the child, allergies or contraindicated medications, and physical or mental disabilities of the child, if any, prior to the in-person evaluation, and present the child health examination form to the physician, physician's assistant or certified registered nurse practitioner for signature at the time of the examination.

- Complete a specific portion of the child health examination form such as the special health or dietary needs of the child, allergies or contraindicated medications, and physical or mental disabilities of the child, if any, after an in-person evaluation that was performed within the timeframes specified by this regulation, and present the completed form to the physician, physician's assistant or certified registered nurse practitioner for signature in person, by facsimile, or via electronic mail.

- Correct a child health examination form upon discovering that the physician, physician's assistant or certified registered nurse practitioner has
recorded inaccurate information or omitted information, ONLY IF a registered nurse (RN) or licensed practical nurse (LPN) contacts the person who performed the evaluation, AND receives permission from that person to correct the child health examination form, AND documents the date, time, and person spoken to on the child health examination form next to the correction.

Facilities are PROHIBITED from doing the following:

• Completing any other section of the child health examination form aside from the special health or dietary needs of the child, allergies or contraindicated medications, and physical or mental disabilities of the child, (if any), unless the home employs a physician, physician's assistant or certified registered nurse practitioner.

• Completing all or a portion of the child health examination form without an in-person evaluation.

• Completing all or a portion of the child health examination form after an in-person evaluation that was performed outside of the timeframes specified by this regulation.

• Changing the content of a child health examination form without the consent of the person who performed the evaluation, or changing the content of a child health examination form by someone who is not a registered nurse (RN) or licensed practical nurse (LPN).

It is strongly recommended that facilities carefully review child health examination forms completed by a physician, physician's assistant, or certified registered nurse practitioner to verify that all of the required information was recorded. Although the evaluations must be completed by medical professionals, facilities are responsible for ensuring that the evaluations were complete and that the child health examination forms were filled out in their entirety.
Regulation: § 3800.188(a) – Medications Administration Training

§ 3800.188(a) - A staff person who has completed and passed a Department-approved medications administration course within the past 2 years is permitted to administer oral, topical and eye and ear drop prescription medications and epinephrine injections for insect bites.

Question: Do staff in the facility need to receive additional training beyond the Medication Administration Train-The-Trainer course to administer epinephrine injections?

ANSWER: No. However, the Department strongly encourages facilities to provide staff with additional training relating to the administration of epinephrine injections.