

**COMMONWEALTH OF PENNSYLVANIA**  
**DEPARTMENT OF HUMAN SERVICES**  
**BUREAU OF HUMAN SERVICES LICENSING**  
**Personal Care Homes** (55 Pa.Code Chapter 2600)

**Q/A - Regulatory Clarifications – October 2017**

*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:        § 2600.186(c) – Prescription Medications**

*§ 2800.186 (c) – Changes in medication may only be made in writing by the prescriber, or in the case of an emergency, an alternate prescriber, except for circumstances in which oral order may be accepted by nurses in accordance with regulations of the Department of State. The resident's medication record shall be updated as soon as the home receives written notice of the change.*

**Emergency Medication System Machines** - It is permissible for homes to use emergency medication system machines. However, these machines are permitted if they are accessible to licensed nurses only. Licensed nurses (RNs or LPNs) must manage the ordering of the emergency doses. Direct care staff should work from a written order provided by the prescriber, or the information written onto the MAR from the nurse taking the verbal order.

**Question:** Can tackle boxes with a lock be used as an emergency medication system machine?

**ANSWER:** No. For personal care homes, tackle boxes with a lock may not be used as an emergency medication system machine. The use of a tackle box system outside of a hospital setting lacks sufficient safeguards that are built in to emergency medication machines.

**Regulation:        § 2600.87 – Lighting**

*§ 2800.87 – The home's rooms, hallways, interior stairs, outside steps, outside doorways, porches, ramps, evacuation routes, outside walkways and fire escapes shall be lighted and marked to ensure that residents, including those with vision impairments can safely move through the home and safely evacuate.*

**Question:** What is required when using a delayed locking device on a door in a licensed personal care home in areas other than those licensed as a secured dementia care unit?

**ANSWER:** The home is required to have written approval or a variance from the Department of Labor and Industry, the Department of Health or the appropriate local building authority to permit the use of a delayed egress system in a licensed personal care home.

Additionally, to ensure that all residents can use these doors during an emergency to evacuate safely, the following lighting and marking requirements apply when delayed locking devices on doors have been approved and are in place:

- A readily visible, durable sign in letters not less than 1 in. (25 mm) high and not less than 1/8 in. (3.2 mm) in stroke width on a contrasting background that reads as follows shall be located on the door leaf adjacent to the release device in the direction of egress: PUSH UNTIL ALARM SOUNDS. DOOR CAN BE OPENED IN 15 SECONDS. (or similar notice with accurate number of seconds)
- Presence of sufficient lighting at all times for the marking to be easily seen and read

BHSL will begin to measure for compliance with sufficient lighting and marking requirements when a delayed egress system is in use in a licensed personal care home in areas other than a secured dementia care unit, effective **April 6, 2018**.

Note: The instructions regarding signage is consistent with the Pennsylvania Uniform Construction Code.