



**State of Louisiana**  
Department of Health and Hospitals  
Office of the Secretary

**Date** November 9, 2015

**TO:** Home and Community Based Service Providers  
Targeted Support Coordination Agencies

**FROM:** Cecile Castello, RN, Director  
Health Standards Section

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Tara LeBlanc, Assistant Secretary  
Office of Aging and Adult Services

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Mark Thomas, Assistant Secretary  
Office for Citizens with Developmental Disabilities

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**RE: ASSESSMENT OF CLIENT CAPACITY TO SELF-ADMINISTER MEDICATIONS AND DETERMINATION OF NEED FOR NON-COMPLEX TASKS TO BE PERFORMED**

Following the implementation of RN delegation for medication administration and non-complex nursing tasks in December 2013, providers requested that a Medication Administration workgroup be formed to address issues needing further clarification regarding medication administration under RN delegation as authorized by R.S. 37:1031 – 1034. Providers requested that the work group include representatives from the Louisiana State Board of Nursing, the Louisiana Home Care Association, DHH Districts and Authorities, Office of Aging and Adult Services (OAAS), Office for Citizens with Developmental Disabilities (OCDD), Health Standards (HSS), Support Coordination, HCBS providers and ICF/IID providers. The work group was assembled and began meeting in April 2014. One of the main concerns was that a clear definition for self-administration of medication to include independent administration, self-guided administration and administration with prompts and reminders was needed. Clear and consistent assessment criteria were also needed to determine a client's capacity to self-administer their medications.

After multiple meetings, the work group developed and finalized definitions for self-administration of medications and completed an assessment tool to more accurately determine a client's capacity to self-administer their own medications. The assessment tool was approved by the State Board of Nursing to pilot for a six month period in October 2014. The pilot was conducted from January 1, 2015 through June 30, 2015. Providers and support coordination agencies that served on the work group participated in the pilot project. Clients on whom the assessment was conducted were waiver clients whose plan of care review came due during the six month pilot. The work group found that the assessment tool worked well overall and provided an accurate determination of the client's capacity. There were some clients whose capacity for self-administration were changed from independent to not independent and vice versa after the assessment was conducted. The definitions developed for independent self-administration, guided self-administration and administration with prompts or reminders appeared to meet the needs of providers who participated in the pilot. Based upon the results of the pilot project, the Board of Nursing granted approval for the assessment tool to be shared with providers for implementation and use on a statewide basis. The definitions for self-administration of medications have also been added to the definitions contained in the *Guidelines for Didactic Training and Determination of Competency*.

We strongly recommend that you begin incorporating the assessment tool into the care planning process for waiver clients served by your agency. This will assist to assure consistency in the assessment criteria used across provider agencies as well as greater accuracy in the determination of client capacity. At this time, use of the assessment tool is not mandatory, however, it will be once it is incorporated into the waiver manuals by OCDD and OAAS. You may access a copy of the assessment tool and the updated *Guidelines for Didactic Training and Determination of Competency* on the following web sites:

Health Standards Direct Service Worker

<http://dhh.louisiana.gov/index.cfm/directory/detail/713>

Office of Aging and Adult Services (OAAS)

<http://new.dhh.louisiana.gov/index.cfm/subhome/12/n/7>

Office for Citizens with Developmental Disabilities (OCDD)

<http://new.dhh.louisiana.gov/index.cfm/subhome/11/n/8>

Questions related to the assessment tool may be directed to the following persons:

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