
 <p style="text-align: center;"><b>PHILADELPHIA PRISONS</b> <b>POLICIES &amp; PROCEDURES</b></p>	<p style="text-align: center;"><b>Policy Number</b> 4.E.24</p>	<p style="text-align: center;"><b>Page 1</b> <b>of 3</b></p>
<p><b>Part: IV</b> -Institutional Services <b>Section:</b> Section E - Health Services</p>	<p><b>Related Pennsylvania Minimum Standards:</b> 37 PA Code § 95.232 <b>NCCHC Standard:</b> J-D-02 <b>ACA Related Standards:</b> 4-ALDF-4C-38-29</p>	
<p><b>Subject:</b> Inmate Keep On Person (KOP) Medication Program</p>	<p><b>Supersedes:</b> Policy 4.E.12 signed on January 27, 2007</p>	
<p><b>Approved:</b>  Commissioner</p>	<p><b>Signature Date:</b> July 22, 2013</p>	
<p><b>Effective Date:</b> August 22, 2013</p>	<p><b>Scheduled PAD Review:</b> Annually <b>Scheduled Commissioner's Review:</b> July 22, 2017</p>	

**Purpose**

The purpose of this policy is to update and formalize a process that ensures efficient distribution of medications to inmates in the Philadelphia Prison System (PPS).

**Policy**

It is the policy of PPS to provide inmates with all prescribed medications.

**Definitions**

*Controlled Substances:* Those drugs included on schedule I through V of the Federal Controlled Substances Act. No schedule I drugs may be used in the PPS.

*DOT (Directly Observed Therapy):* Medications that are administered by Nursing Staff dose by dose [also referred to as "Hand Feed" or "Pill Pass" medications].

*Hand Feed Medications:* See DOT.


*Infirmery (PHSW):* PPS' medical/surgical and behavioral health inpatient unit.

*KOP (Keep on Person):* Medications that are dispensed by Nursing Staff in multiple dose quantities, and are then possessed by inmates and self-administered.

*MAR:* Medication Administration Record pertaining to individual inmate prescriptions and scheduled dosages.

*Legend Medications:* Drugs which are required by state law or regulation of the board of pharmacy to be dispensed on prescription only, or are restricted to use by practitioners only.

*Pill Pass Medications:* see DOT

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*Practitioners:* Physicians, dentists and podiatrists with valid Pennsylvania licenses, opticians meeting requirements for prescription of optometry legend medications, and physician assistants or advanced practice nurses who meet requirements to prescribe certain or all legend medications.

*Psychotropic Medications:* Medications used to treat psychiatric illnesses.

*Red Flag Medication Compliance System:* Policy and procedure to assure that inmates receive all prescribed medications.

*Transition Units:* Behavioral/mental health units for inmates not suitable for general population housing, who require supplemental behavioral health care.

**Procedural Overview**

All medications prescribed within PPS facilities will be considered either KOP or DOT medications.


KOP medications will be dispensed in blister packs and provided to inmates for self-administration. The inmate is permitted to possess up to a 30 day supply of KOP medications secured in his/her housing area until depleted or until the expiration date on the medication blister pack label, whichever is earlier. Each blister pack will display a re-order sticker. An inmate may request a refill of a medication by bringing the blister pack to the “pill pass” nurse. Inmates may request a re-order when five days of medication is remaining in the blister pack.

Delivery of KOP to inmates must be acknowledged in the health record by the inmate's signature on a MAR or other permanent sheet in the health record. The pharmacy packing receipts or inventory forms that accompany dispensed medications from the pharmacy to the facilities are not to be used for this purpose.

KOP medications are to be kept in inmate’s housing area.

KOP medications may not be prescribed for, held by, or used by inmates in PHSW, including the inpatient behavioral health unit, nor in Transition Units. Inmates returning from the Transitional Unit back to general population medication will be DOT.

Medications dispensed as KOP at one facility may be used without re-packaging or new labeling at another PPS facility after an inmate is transferred, subject to facility conditions (such as transfer into a segregation setting) and to the prohibitions noted above. Routinely scheduled outpatient clinic follow-up visits with a nurse practitioner, physician’s assistant or a physician will be used to monitor inmate responses to, and to ensure inmate adherence to prescribed KOP therapies.

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DOT is provided to inmates by appropriate health staff one dose at a time, and each dose is documented in the health record on a MAR. In general, DOT medications include:

- Controlled substances/scheduled medications ("Narcotics");
- Psychotropic medications;
- Medications used in the control or prevention of dystonic reactions;
- Substances of potential abuse;
- Anti-tuberculosis drugs used for treating tuberculosis infection;
- Anti-retroviral medications, including but not limited to those currently used in treatment of HIV, Hepatitis B, or Hepatitis C;
- Coumadin, and;
- Dilantin

On occasion, an inmate on medications that fall under the DOT category may be allowed to keep and take those medications on their own. To qualify for KOP, the inmate must demonstrate a thorough understanding of their medical condition and treatment plan, as well as excellent adherence to prescribed drug therapy. This must be well documented in the health record by the treating physician. Standard KOP policies apply to DOT medications dispensed as KOP.

Individual inmates who have a propensity to abuse or misuse medication may be required to receive all medications through a DOT process. When this is done, the reasons are to be documented in the health record and an order written to that effect.

The Red Flag Medication Compliance System (refer to PPS Policy and Procedure 4.E.24.2) also will be used to monitor and ensure adherence to prescribed therapies for all medications that are administered through the DOT process.

This DOT process does not apply to 600 University Avenue and any other work release facilities as may exist where all medications are dispensed through the KOP process.