



Jim Doyle  
Governor

Helene Nelson  
Secretary

**State of Wisconsin**

**Department of Health and Family Services**

Telephone: 608-266-8481  
FAX: 608-267-0352  
TTY: 608-266-7376  
www.dhfs.state.wi.us

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**BQA Memo 04-006  
Addendum**

<b>To:</b>	Adult Family Homes	AFH – 02
	Adult Day Care	ADC – 02
	Community Based Residential Facilities	CBRF – 02
	Residential Care Apartment Complexes	RCAC – 02

**From:** Kevin Coughlin, Chief, Assisted Living Section

**Via:** Cris Ros-Dukler, Director, Bureau of Quality Assurance

Draft

**Sample Medications**

**ISSUE**

Can residents in assisted living facilities use sample medications?

**BACKGROUND**

Sample medications are medications that manufacturers provide to physicians. These samples are used as starter supplies when patients are started on a new medication. Today however, more often physicians will use these sample medications for patients who have difficulties affording medications. In some cases, the sample medications are no longer used as a starter supply but are used for ongoing supplies.

The issue with samples is that they are not typically packaged and labeled by pharmacies. State law does exempt sample medications dispensed by physicians from the labeling requirements in s. 450.11. Physicians however must keep the sample medication in the packaging from the manufacturer. The problem for assisted living programs is that the sample packaging may not meet the regulations or provide adequate information to safely administer the medications.

**RESPONSE**

Residential Care Apartment Complexes (RCACs): Residents who administer and control their own medications can use sample medications as directed by their physician. When the RCAC is responsible for medication management, it is recommended that the registered nurse responsible for medication management work with a pharmacist to set up some guidelines for the use of samples. Guidelines usually include maintaining samples in original packaging, obtaining written instructions from the physician etc. Medication set up follows BQA memo 04-06.

**Adult Day Care (ADCs):** Participants who administer their own medications can use sample medications as directed by their physician. However, the standards in Adult Day Care programs require medications to remain in original packaging (I.F.(3)(c)) when day care staff administer medications. Therefore participants in adult day care who have staff administer medications need to make sure the sample medications remain in the sample packaging received from the physician. Since labeling and information is usually lacking when sample products are used ADC staff may need to make specific requests to obtain written information about the medication and consult with the physician about the use of the sample drug (Standards I.F.(3)(d)&(e)). Medication set up follows BQA memo 04-06.

**Adult Family Homes (AFHs):** Residents who administer and control their own medications can use sample medications as directed by their physician. If the AFH staff is administering sample medications the medications must come to the facility in the original sample packaging from the physician. Medication set up follows BQA memo 04-06.

**Community Based Residential Facilities (CBRFs):** Residents who administer and control their own medications can use sample medications as directed by their physician. If CBRF staff is administering sample medications the medications must come to the facility in the original sample packaging provided by the physician. Medication set up follows BQA memo 04-06. If the CBRF does not have a nurse, the sample medications must be in unit dose or unit time packaging from the physician or a pharmacist. Pharmacists at their discretion may repackage sample medications that have been dispensed from a physician to meet the CBRFs unit dose packaging requirements.

The following chart summarizes the use of sample medications.

<b>Use of Sample Medications in Assisted Living</b>					
<b>Facility Type</b>	<b>ADC</b>	<b>AFH</b>	<b>CBRF</b>		<b>RCAC</b>
			<b>Supervised</b>	<b>Not Supervised</b>	
Resident/Tenant/Participant Self-administers: Samples can be used and packaged as they wish.	Y	Y	Y	Y	Y
Facility staff administer: sample medications can be used	Y	Y	Y	Y	Y
Sample medication set up when staff administer- BQA memo 04-006 applies	Y	Y	Y	Y*	Y

\*Unit dose packaging by a pharmacist is required unless physician dispensed sample is already in unit dose packaging.