To: All Assisted Living Residences  
From: Randy Kuykendall, Division Director, Health Facilities and Emergency Medical Services  
Re: Pre-Pouring Medications No Longer Allowed in Assisted Living Residences

Effective July 1, 2014, pre-pouring medications is no longer allowed in assisted living residences.

To be consistent with all other division health facility programs and to ensure resident/patient/client safety in all licensed programs, the division has decided the pre-pouring of medications in ALRs will not be permitted. Pre-pouring is the setting up (pouring) of medications without the intent to immediately administer to consumer/resident, or the setting up of medications for more than one consumer/resident at a time. Pre-poured medications can lead to medication errors. A study of medication errors in the assisted living residence program over the prior two-year period revealed three complaint investigations in which pre-pouring medications contributed to errors that caused significant harm to residents. To promote best practice, qualified medication administration persons (QMAPs) should prepare medications as close as possible to the time that they are to be administered and only administer medications they have prepared themselves.

The division would like to allow any ALRs who currently have staff pre-pouring medications a period of time to realign their policies and procedures to be in compliance with this policy. As of July 1, 2014, division staff will begin to survey to ensure staff do not pre-pour medications.

Below is a summary of the stakeholder meetings that occurred prior to this decision:

- In September 2013, the division’s management team identified that the Assisted Living Residence (ALR) Program was the only health facility program that permitted pre-pouring of medications by licensed or unlicensed staff.
- On October 24, 2013, division staff met with the members of the Colorado Council of Assisted Living to discuss the concerns surrounding medication pre-pouring in assisted living residences; plans were made to meet with a group of assisted living providers from LeadingAge Colorado.
- On November 19, 2013, division staff met with assisted living providers from LeadingAge Colorado. Many ALR providers stated they no longer allowed medication the practice of pre-pouring medication.
- On December 9, 2013, division representatives met with instructors from the qualified medication administration persons (QMAP) program. Instructors were notified to instruct students that pre-pouring was no longer accepted in assisted living.
- On January 23, attendees at the ALR Advisory Committee were informed that assisted living residence providers would soon be notified via the division’s web portal that there would be no more pre-pouring of medications by Qualified Medication Administration Persons (QMAPs).

During these meetings, there was little opposition raised regarding this change.

Please note that medications administered from a medication reminder box (MRB) are not considered pre-poured medications. Please refer to Chapter XXIV, Medication Administration Regulations, Section 6, Medication
Reminder Boxes for information regarding the use of medication reminder boxes. If you have any questions, contact Dee Reda, the interim program manager of the Assisted Living Residence program, at 303-692-2893.