From: Hoover, Joshua
To: OLTL-ADULT-RESIDENTIAL-LICENSING@LISTSERV.DHS.PA.GOV
Subject: Administration of Subcutaneous GLP-1 Agonist Medications by Unlicensed Staff
Date: Wednesday, May 22, 2024 9:44:00 AM

Dear Personal Care Home (PCH) and Assisted Living Residence (ALR) Providers,

This communication contains important information about the potential administration of Glucagon-like peptide (GLP)-1 agonist medications, such as Ozempic (Semaglutide) and Trulicity (Dulaglutide) via subcutaneous injection by unlicensed staff in PCH and ALR settings.

55. PA Code Chapter 2600 and 55. PA Code Chapter 2800 allow for the administration of oral, topical, eye, nose, and ear drop prescription medications by unlicensed Direct Care Staff who have completed the Department's Medication Administration Training Program. Unlicensed Direct Care Staff who receive annual diabetes education by a Certified Diabetes Educator, in addition to completing the Medication Administration Training Program, may also administer epinephrine and insulin injections.

Although they are utilized to manage diabetes, GLP-1 agonist medications are not insulin; they are an entirely different class of medications that are often administered as subcutaneous injections. **The requirements of §2600 and §2800 do not allow for the administration of subcutaneous GLP-1 agonist medications by unlicensed staff persons.**

However, the Bureau of Human Services Licensing recognizes that these medications are becoming more common in the management of diabetes and is willing to consider regulatory waivers, as permitted by §2600.19 and §2800.19, to provide for the subcutaneous administration of GLP-1 agonist medications by unlicensed staff persons on a case-by-case basis.

To be considered for a regulatory waiver, PCH and ALR settings must submit the Department's Request for Waiver of Regulation to BHSL Headquarters. Before applying for a waiver, the PCH/ALR setting should review the general requirements related to regulatory waivers under §2600.19 and §2800.19, including the notification and comment period for residents of the facility.

To be considered for a waiver permitting the administration of subcutaneous GLP-1 agonist medications by unlicensed staff persons, the following specific requirements must be met:

- All Direct Care Staff administering these medications must:
    - Have successfully completed the Department's Medication Administration Training Program.
    - Receive in-person training on administering subcutaneous injections from a

licensed health care professional.
    - Receive training on the specific medication being administered, including potential side effects, medication interactions, and appropriate observation and reporting from a licensed health care professional.
    - Receive at least 6-hours of annual training related to subcutaneous injections, GLP-1 agonist medications, and diabetes management from a licensed health care professional. (Diabetes education required by §2600.190(b) and §2800.190(b) may be counted for up to 3 of the 6 annual training hours).

- PCH/ALR settings must also:
    - Develop and implement policies and procedures for the administration of GLP-1 agonist medications, including written procedures for administration, documentation, monitoring, evaluating, observation, and reporting. All Direct Care Staff administering these medications must be trained on these policies and procedures.
    - Have a licensed health care professional available for consultation at all times. The health care professional must be either an employee of the facility or under contract.
    - Maintain documentation verifying all of the requirements of the waiver.

When a PCH or ALR setting determines that the above conditions can be met, they should complete the Request for Waiver of Regulation and submit it to ra-pwarlheadquarters@pa.gov.

If a regulatory waiver is approved for your facility, the conditions of the waiver will be verified during your annual inspection.

Please note that subcutaneous GLP-1 medications <u>may not</u> be administered by unlicensed staff without an approved regulatory waiver. Additionally, this communication relates only to the subcutaneous injection of GLP-1 agonist medications and not to any other subcutaneous injections.

Questions about this communication may be directed to ra-pwarlheadquarters@pa.gov.

Thank you,

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