



**COMMENT LETTER**

**Subject:** Comments on Proposed Regulation Change (K.A.R. 68-7-10)

**Submitted by:** LeadingAge Kansas

**Date:** 5/12/2025

LeadingAge Kansas appreciates the opportunity to provide feedback on the proposed changes related to emergency drug kits (e-kits). We are concerned with the language in stating that e-kits are only to contain drugs necessary for emergencies. While we understand the intent, this restriction could unintentionally limit timely access to clinically necessary medications.

Many maintenance medications—such as warfarin—are not classified as “emergency” drugs, yet missing even a single dose can cause serious harm to a resident. Providers routinely rely on e-kits to bridge short gaps in medication supply, ensuring continuity of care and avoiding adverse outcomes. Limiting e-kit contents solely to emergent-use drugs creates confusion for staff and regulators alike and does not reflect the practical realities of care delivery in long-term care settings.

We respectfully recommend clarifying the language to allow medications necessary to prevent clinical deterioration or harm due to missed doses—not only those required for sudden emergencies. This change would support resident safety and operational clarity for providers.

Respectfully submitted,

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