

Massachusetts Department of Public Health School Health Services Unit

Massachusetts Controlled Substance Registration (MCSR) Guidance Document:

- 1) School Health Controlled Substance Registration (Medication Delegation)
- 2) School Epinephrine Controlled Substance Registration (Epinephrine Training)

All primary and secondary public and non-public schools in the Commonwealth are required to comply with [M.G.L. 94C: The Controlled Substances Act](#) and [105 CMR 210.000: The Administration of Prescription Medications in Public and Private Schools](#).

All primary and secondary public and non-public school entities that handle and store medications must obtain a Massachusetts Controlled Substance Registration (MCSR) via the Massachusetts Department of Public Health (MDPH) School Health Services (SHS).

Only **licensed healthcare professionals** may administer medications in Massachusetts primary and secondary public and non-public schools **unless** the school entity's Registered Nurse (RN) completes the application for the **School Health MCSR** (delegation) **and/or** the application for **School Epinephrine MCSR** (epinephrine training).

This guidance document details the process by which primary and secondary public and non-public school entities in the Commonwealth can apply for authorization to allow a school nurse (RN) to:

1. **Delegate** the administration of medications to Unlicensed School Personnel (UAP)
2. **Train** their staff on the administration of student-specific pre-dosed epinephrine

While [105 CMR 210.000](#) allows a school committee or board of trustees, in consultation with the board of health, to seek authorization from MDPH SHS to delegate administration of medications to UAPs; delegation to UAPs is not intended to take the place of a school nurse but rather intended to add flexibility to the nurse's daily practice.

[105 CMR210.000](#) requires that *"The School Committee or Board of Trustees, in consultation with the Board of Health where appropriate, shall provide assurance that sufficient school nurse(s) are available to provide proper supervision of unlicensed school personnel."*

MDPH SHS recommends that a needs assessment be completed by the school nurse with attention paid to those children with special health care needs, as well as emergency response time for each building when determining safe and appropriate health office staffing.

Note: An RN must always be on-call/available for consultation when a delegated medication is being administered by the trained UAP. Training materials can be found on [BU SHIELD's Medication Admin and Delegation resource page](#).

The primary or secondary school/district must have policies for handling, storage, delegation, and disposal of prescription medications and these policies must comply with the laws of the Commonwealth and the regulation [105 CMR 210](#). The written policies can be requested by MDPH SHS at any time.

The RN that applies for the MCSR(s) **is** the Medication Manager (the Medication Manager must be a Registered Nurse in the Commonwealth of Massachusetts) and is legally responsible for the management of the medication administration and/or epinephrine training program for their school entity.

Please Note: When the Medication Manager (RN) leaves their position, they **must** inform the MDPH School Health Unit via email medication.delegation@mass.gov. Otherwise, the RN will remain on the MCSR as the RN responsible for the management of the school entity's medication program.

Registration Instructions for Medication Delegation & Epinephrine Training

- Obtain certificates of attendance from the two mandatory BU SHIELD courses, [Medication Administration in a School Setting: School Nurse Practice in Massachusetts](#) (credit or audit version) and [Medication Administration in Schools: What School Nurse Managers Need to Know](#). Both classes need to be taken every **three** (3) years.
- Meet with the signatories to review the school/district policies regarding health services, medication administration, and/or epinephrine training at least every other year. All signatories must sign the [MDPH Signature Page](#). The signatures can be scanned and emailed or be an electronic signature (typed signatures will not be accepted).

Please note: This is the **only** approved signature page. It is used for **both** MCSR applications.
- Fill out the [MDPH Staffing Spreadsheet](#) when applying for the **School Health MCSR**. The staffing spreadsheet is **not** required for the School Epinephrine MCSR application. Please include only the healthcare professionals and health office support staff that are working in the school health office. Healthcare professionals assigned to an individual student or specific classroom should not be included in the staffing spreadsheet. Other school staff (i.e. secretaries, teachers, school administrators, etc.) are **not** to be included on the staffing

spreadsheet.

- Create a [Health Professions Licensing System](#) (HPLS) user account (account needs to be in the RN Medication Program Manager's name. Recommended to use your school/work email address).
- Log onto your [HPLS](#) account. Complete the **online** application(s).

[MDPH School Health Services MCSR Application Instruction Guide](#)

If you need assistance with the **website**, please complete the online complete the online [eLicensing Support Request Form](#) or call the Help Desk at (800) 414-0168. If you have questions specific to the application process after following this guidance reach out to medication.delegation@mass.gov.

- The school entity's registration expires **one year** (365 days) from the MCSR approval date. School entities can apply for a **new** registration up to 90 days prior to the expiration date. It is recommended that your application is submitted **at least** two (2) weeks prior to the expiration date to avoid a lapse in registration, as this is the average processing/approval time. Applications are approved in the order they go into the system.
Please note: There is **no option for renewal**; it is a **new** application **each year** for **both** MCSRs.

Optional Back-Up Medication Manager (RN)

School entities have the option to include a back-up Medication Manager (RN) with their MCSR application(s). In the event the primary Medication Manager (RN) leaves their position, or steps down from this registration, the back-up Medication Manager (RN) on this application can immediately fill in as the primary Medication Manager (RN), without lapse of registration. In the event there is no back-up Medication Manager (RN), or the back-up Medication Manager (RN) does not confirm their intention to become the primary Medication Manager (RN) within **10 business days** (2 weeks), the school district/school's registration will be null and void and the school district/school cannot delegate medication to unlicensed school staff.

The optional back-up Medication Manager (RN) **must**:

1. Be a Registered Nurse in the Commonwealth of Massachusetts
2. Complete both required BU SHIELD medication courses. The certificates of completion for both courses need to be uploaded to the online application under 2nd RN Contact section. Both classes need to be taken every **three (3)** years.
 - [Medication Administration in a School Setting: School Nurse Practice in Massachusetts \(credit or audit version\)](#)
 - [Medication Administration in Schools: What School Nurse Managers Need to Know](#)