



# The Commonwealth of Massachusetts

Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Professions Licensure  
Drug Control Program  
239 Causeway Street, Boston, MA 02114

CHARLES D. BAKER  
Governor

KARYN E. POLITO  
Lieutenant Governor

MARYLOU SUDDERS  
Secretary

MONICA BHAREL, MD, MPH  
Commissioner

Tel: 617-624-6000  
[www.mass.gov/dph](http://www.mass.gov/dph)

## NOTICE

**TO:** Massachusetts Public School Districts and Private Schools  
**FROM:** David E. Johnson, Director, Drug Control Program  
**SUBJECT:** Massachusetts Controlled Substance Registration for School Nurse Delegation Programs  
**DATE:** June 30, 2020

The purpose of this notice is to inform you that a current Massachusetts Controlled Substance Registration (MCSR) is required to authorize delegation of medication administration in school settings by a registered nurse to unlicensed school personnel if a School Committee or Board of Trustees approves a proposal to permit such delegation.<sup>1</sup>

In order for a registered nurse to delegate administration of medications in a school, the school must first receive approval from the Department of Public Health's (DPH) School Health Unit (SHU) and register with the Drug Control Program (DCP).<sup>2</sup> Renewal of this MCSR each year, through application and payment of a fee, is essential, as without a current MCSR a registered nurse has no authority to delegate medication administration in a school setting.<sup>3</sup> SHU approval alone is insufficient for this purpose, and failure to obtain an MCSR could place the registered nurse and the school at risk of non-compliance with the Controlled Substances Act.<sup>4</sup>

If a School Committee or Board of Trustees has not approved such a proposal, registration with DCP is not necessary. However, medication must be self-administered or administered directly to students by licensed health care providers, without delegation to unlicensed school personnel.

Please contact [DCP.DPH@massmail.state.ma.us](mailto:DCP.DPH@massmail.state.ma.us) with any questions or concerns.

---

<sup>1</sup> Notwithstanding any general or special law to the contrary, the department of public health shall promulgate regulations governing the administration of medications, including psychotropic medications to children in school settings, in accordance with sections 7 and 9 of chapter 94C. In developing such regulations, the department shall consult with the board of registration in nursing and the board of registration in medicine. M.G.L. c. 71, § 54B.

<sup>2</sup> 105 CMR 210.004: Policies Regarding Delegation of Prescription Medication Administration (A) The School Committee or Board of Trustees, consulting with the Board of Health where appropriate, may approve a proposal, developed by the school nurse and school physician, to permit the administration of prescription medications to be delegated by the school nurse to unlicensed school personnel. Such delegation may occur only if the school district registers with the Department of Public Health pursuant to the applicable provisions of 105 CMR 700.000 and complies with the requirements of 105 CMR 210.000.

<sup>3</sup> 105 CMR 700.003: Registration of Persons for a Specific Activity or Activities in Accordance with M.G.L. c. 94C, § 7(g) (E) A school district or private school may register solely for the purpose of permitting trained school personnel to administer controlled substances in accordance with 105 CMR 210.000: *The Administration of Prescription Medications in Public and Private Schools*.

<sup>4</sup> M.G.L. c. 94C