**To:** Massachusetts Department of Public Health

**From:** Marette Power BSN, RN, NCSN, MSNO president

**Date:** February 13, 2025

**RE:** Proposed amendments to 105 CMR 210.00: The Administration Medication in Public and Private Schools.

As the president of MSNO, I represent over 700 school nurses across the state of Massachusetts. When the proposed changes to CMR 210.00 were announced, they were shared with our membership with a call for comment. I am summarizing the comments that were received to respectfully submit for consideration.

**Section 210.02 Definitions:**

Regular School Activities: As this definition further defines the school day to encompass all school sponsored activities, there is a concern that increasing the range of medications that may be trained or delegated could further strain a system that is already experiencing nurse shortages. This would likely necessitate school nurse coverage for medication and medication delegation for more than 10 hours daily including coverage for transportation, after school activities, and field trips.

Medication Program Manager and School Nurse: Given the complexities of these proposed regulations, it is recommended that the definition of a Medication Program Manager would include the Massachusetts Department of Education School Nurse license. Ideally, this requirement would also be incorporated into the definition of a School Nurse.

Medication: It is recommended to provide further clarification by defining over-the-counter medication as anything that includes a drug fact sheet.

**Section 210.04 Policies Regarding Delegation of Medication for Administration:**

(B) (2) We recommend adding (h) They consent to the training and the duties required.

(B) (4) We recommend that this paragraph be clarified to specify which emergency medications will be considered as a training, and which emergency medications will be delegated. As currently written, the worded is unclear and may cause confusion.

(B) (5) We recommend clarifying, as needed (prn) emergency medications do not require school nurse consultation before each dose. (rather than ‘with the exception of’) We would recommend further clarifying ‘as per the emergency medication plan’.

**Section 210.05 Responsibilities of the School Nurse Regarding Medication Administration**

(D) (3) (a) We recommend including electronic signature as an option. (for caregiver printed name/signature)

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**Section 210.08 Handling, Storage and Disposal of Medications**

(E) We recommend that this section specify that medications may be retrieved at any time from the school nurse. Many medications given in schools are at risk for diversion. There may need to be a provision that the school nurse is available for the retrieval of medication.

We appreciate the opportunity to provide public comment. Please consider our suggestions, and feel free to reach out with any questions or requests for clarification.

Respectfully,

Marette Power

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