April 23, 2019

The Honorable Betsy DeVos  
Secretary of Education  
400 Maryland Avenue SW  
LBJ Education Building, 7W311  
Washington DC 20202

Dear Secretary DeVos:

Approximately 27% of children live with chronic health conditions that affect their daily lives at home and at school. Many of these conditions require ongoing medical attention including the administration of medication while at school. Medication used and administered properly can improve student health and quality of life, but may be harmful if administered incorrectly. Common errors related to the administration of medication include giving the wrong dose, not giving the dose as scheduled, and administering the medication to the wrong person.

It is critical that every school have a registered professional school nurse who is responsible for the oversight of medication administration at school, and the development of written policies and procedures that focus on safe and efficient administration at school. Having comprehensive guidelines in place at the district level - such as those outlined in the National Association of School Nurses’ (NASN) position statement, *Medication Administration in the School Setting* and the American Academy of Pediatrics’ (AAP) policy statement, *Guidance for the Administration of Medication in School* - provides for the safe and efficient administration of medications to students.

Written policies and procedures should address:
- nursing delegation (when permissible by state law including state nurse practice acts, rules, and regulations), training, and supervision of unlicensed assistive personnel to administer medication;
- eight rights of medication administration to include right patient, medication, dose, route, time, documentation, reason and response;
- student confidentiality;
- medication orders;
- medication doses that exceed manufacturer's guidelines;
- proper labeling, storage, disposal, and transportation of medication to and from school;
- documentation of medication administration;
- rescue and emergency medications;
- off-label medications and investigational drugs;
- prescription and over-the-counter medications;
- complementary and alternative medications; and
- psychotropic medications and controlled substances.
In addition, procedures to properly identify students who should receive medication (e.g., a photo ID with the student’s name, date of birth, drug allergies, parent/guardian contact information) need to be in place for both the school nurse and other school staff (as appropriate and permissible by state and district policy).

NEA and NASN request that the U.S. Department of Education provide guidance to states that provides for safe and efficient administration of medications to students such as those outlined in the NASN’s position statement, *Medication Administration in the School Setting* and the AAP’s policy statement, *Guidance for the Administration of Medication in School*.

Thank you for your consideration. Should you wish to discuss this, please reach out to Jennie Young at jyoung@nea.org.

Sincerely,

Nina Fekaris

Donna Harris-Aikens      Nina Fekaris  
Senior Director, Education Policy and Practice  President  
National Education Association  National Association of School Nurses