

Medication Administration by Student Nurses: What Are The Regulations?

Recently, the Section for Long-Term Care Regulation provided guidance related to the regulations governing medication administration in licensed nursing homes. The guidance was an attempt to make sure that nursing home Administrators and Directors of Nursing were not caught unaware during a survey or complaint investigation and cited for regulatory violations that they did not realize existed in their homes – it was not meant to further restrict the ability of nursing programs or nursing students to use nursing homes as training sites.

After that article was published on this listserv, it became apparent that while some nursing homes and nursing programs were operating within those long-standing regulatory guidelines, others were not, and in many cases, that was simply because of confusion or misinformation surrounding the relevant regulations.

It remains the position of SLCR that nursing students can safely use nursing homes as clinical training sites, and that residents and students can both benefit greatly from this arrangement when appropriately supervised. Furthermore, to better facilitate the training of student nurses, and to simplify the process of maintaining compliance with the regulations (while still ensuring the safety of residents), SLCR is adopting a new approach toward facilitating nurse training in nursing homes by allowing for exceptions to be granted to individual homes with regard to the following two state regulations:

19 CSR 30-85.042 (49): *Medications shall be administered only by a licensed physician, a licensed nurse or a medication technician who has successfully completed the state-approved course for medication administration.*

19 CSR 30-85.042 (50): *Injectable medication, other than insulin, shall be administered only by a licensed physician or a licensed nurse. Insulin injections may be administered by a certified medication technician who has successfully completed the state-approved course for insulin administration.*

Exceptions to these regulations will allow licensed homes to serve as training sites for nursing students, and will eliminate the need for students who are passing medications to first become Certified Medication Technicians, as has previously been required.

All requests for these exceptions should be sent to Carmen Grover-Slattery, Policy Unit Manager in SLCR Central Office. General information related to the process for requesting an exception is available on the DHSS website, at the following address:

<http://health.mo.gov/seniors/nursinghomes/providerinfo.php>

The document referenced above outlines information that is typically required as part of the application for an exception. In addition to the general information outlined in that document, please also submit the following items to the SLCR exceptions committee for review, in order to help facilitate a more timely response to these particular exception requests:

- A copy of the written agreement(s) between the nursing home (clinical site) and the designated nursing school.
- A copy of the home's medication administration policy.
- A copy of relevant policies and procedures which explain how the nursing home will notify residents that student nurses occasionally work in the home, and that they may refuse services provided by student nurses.

It is very important to note that the administration of medication in nursing homes is still governed by regulations that apply to licensed nursing homes, and also by separate regulations that apply more specifically to licensed individuals. If you intend to participate in the training of nurses at your nursing home, please take time to also become familiar with the minimum standards for nursing programs and for preceptors set forth by the State Board of Nursing. RN programs are addressed in Chapter 2 of those standards, and LPN programs are addressed in Chapter 3:

<http://www.sos.mo.gov/adrules/csr/current/20csr/20csr.asp#20-2200>