

This joint guidance is issued by the Kentucky Department of Education (KDE), the Kentucky Board of Nursing (KBN), and the Kentucky Department for Public Health (KDPH) to provide important clarifications regarding the 2025 updated KDE medication administration training materials for unlicensed school personnel.

The update to the medication training program is consistent with standards of practice established by the National Association of School Nurses in its (NASN) [School Nursing Evidence-based Practice Clinical Guideline Medication Administration Translation into Practice Recommendations](#). It creates uniform clinical practice guidelines for the administration of medication in schools and gives the school nurse evidence-based recommendations for the safe care of pre-K-12 students who receive medications.

The new guidance aligns with the American Academy of Pediatrics' (AAP) support of school medication policies that prioritize safety, require provider oversight, and promote collaboration between school health staff, families, schools and healthcare providers. The guidance also incorporates the [KBN Advisory Opinion Statement #16 2/2023](#) Roles of Nurses in the Administration of Medication Via Various Routes and [KBN Advisory Opinion Statement #30 6/2025](#) Roles of Nurses in School Nursing Practice.

Background and Legal Mandate for Training Program Development

The development of these training materials is mandated by Kentucky law. Kentucky Revised Statutes ([KRS 156.502](#)) establishes parameters for school employees regarding the administration of medication in the school setting. Kentucky Administrative Regulations [702 KAR 1:160](#) School health services, Section 5, charges KDE to develop a training program on medication administration in the school setting in conjunction with the KBN. Furthermore, [KRS 156.501](#) tasks KDE with the development of training and protocols for medication administration by designated nonmedical school personnel, in cooperation with the KDPH. These statutes underscore our shared responsibility to provide clear, evidence-based guidance to school districts across the Commonwealth.

Provided below are questions submitted to our respective agencies that we would like to provide clarification.

- 1. Q: Can over-the-counter medications (OTC) be administered in the school setting with only parental/guardian consent in the Commonwealth of Kentucky?**

A: In short, no. While [KRS 314.011](#) outlines the registered nurse's scope of practice regarding medication administration, the Kentucky Board of Nursing (KBN) has also issued Advisory Opinion Statements (AOS). Although these statements do not carry the force of

law, they represent the Board's official opinions and serve as guidance on what constitutes safe nursing practice. These AOS can be accessed at [Advisory Opinion Statements - KBN](#).

In accordance with [KBN Advisory Opinion Statement #16 Roles of Nurses in the Administration of Medication Via Various Routes \(2023\)](#),

When a nurse, as an employee or volunteer of a health care delivery system, provides non-prescription medication to an individual, the nurse should do so based on an order from a qualified healthcare provider or medically approved guidelines to supply the non-prescription medication.

Therefore, OTC medications should not be administered in the school setting without a qualified health care provider's (e.g., a physician, APRN, PA or medical director) signature as well as signed parental/guardian consent. OTC medications are also permitted to be administered when part of standing orders or protocols are signed by a qualified health care provider.

2. Q: What is considered a medically approved guideline regarding OTC medication administration in the school setting in the Commonwealth of Kentucky?

A: In this context, a medically approved guideline is a formal protocol or standing order signed by a qualified health care provider (e.g., a physician, APRN, PA or medical director), that authorizes school nurses to administer OTC medications to students detailing the conditions in which the medication should be administered and includes the correct dosing, route, frequency and duration as well as any associated emergency plans.

3. Q: Is a prescription pharmacy label the same as a medical provider's order in the Commonwealth of Kentucky?

A: Referring to Question 1: A pharmacy label is not a written order, signed by a qualified health care provider that authorizes administration of the medication. It may reflect what medication was dispensed, but it is not sufficient on its own as a provider's order for administration.

Consequently, school nurses must have a valid, signed medical order in addition to the labeled medication. This ensures safe, authorized care and protects both students and staff.

4. Q: Can over-the-counter medication label instructions for use be used as a medical provider's order in the Commonwealth of Kentucky?

A: Referring to Question 1: While (OTC) medication labels follow a standardized format called the Drug Facts Label, regulated by the Food and Drug Administration, it does not substitute for a signed health care provider's order that authorizes administration of the medication.

The primary purpose of a Drug Facts Label is to help consumers make informed decisions about safe and effective use of these medications, with the goal to ensure clarity, consistency and accessibility for the public, not to serve as a clinical reference for health care professionals.

All school districts should have written policies and procedures for medication administration. Districts may choose to allow administration of OTC medications, but they may also decide to restrict administration of OTC medication. KDE encourages all school districts to contact their local board attorney for policy development and procedural questions.

Nurses must perform only those duties they are legally trained, licensed and authorized to under state law, nursing board regulations and their professional education (RN, LPN, APRN). It is critical that nurses use their professional judgment as licensed professionals and work within their scope of practice. This includes performing a nursing assessment to help determine the student's chief complaint, what risks might be present and what kind of interventions or follow-up are needed. Also, determining whether administering medication is appropriate or not, and if so, to observe student responses and identify any adverse effects. The role of the school nurse is to implement prescribed medical orders and provide nursing care, not to diagnose medical conditions.

In conclusion, while we as agencies are charged by law to develop these training programs and provide this material, it is important to emphasize that it is the individual school district's responsibility to revise and develop its own policies and procedures regarding medication administration in the school setting. Local districts are strongly encouraged to adopt these guidelines to ensure adherence with state laws and regulations. The goal of this joint statement is to provide recommendations for districts and school nurses while helping ensure the safety and well-being of all students in the school setting.