



## Department of Health

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Governor

**HOWARD A. ZUCKER, M.D., J.D.**  
Commissioner

**SALLY DRESLIN, M.S., R.N.**  
Executive Deputy Commissioner

April 19, 2017

Dear School-Based Health Center Medical Director,

The purpose of this letter is to remind you of the requirements for School-Based Health Centers (SBHCs) to implement proper security, control and accountability over medications and related pharmaceutical supplies (i.e., syringes and needles). This notice follows an audit performed by the Office of State Comptroller (OSC) in 2017 to ensure that the 2014 audit findings and recommendations regarding inventory and security of medications and related pharmaceutical supplies were implemented in SBHCs. The findings of the follow-up audit revealed that the two SBHCs that were visited were out of compliance with the required inventory of medications and related supplies.

Each Article 28 sponsor is responsible for ensuring the health and safety of all patients served by the SBHC by ensuring the proper selection, storage, preparation, distribution, use, control, disposal and accountability of medications and related pharmaceutical supplies. This includes maintaining accurate inventory and records that account for all medications and related pharmaceutical supplies provided by the Article 28 sponsor (i.e., "sponsor-supplied") as well as any student-supplied medications stored or managed by the SBHC for the school.

The *Principles and Guidelines for School Based Health Centers in New York State* were updated in 2015 to incorporate these requirements related to the security, control and accountability of medications and related supplies. The *Principles and Guidelines* document is available on the New York State Department of Health (Department) website at: [http://www.health.ny.gov/facilities/school\\_based\\_health\\_centers/docs/principles\\_and\\_guidelines](http://www.health.ny.gov/facilities/school_based_health_centers/docs/principles_and_guidelines)

All SBHCs are required to develop and implement policies and procedures that document all sponsor-supplied medication and related supply transactions, including a system of records and bookkeeping for all medications and supplies in accordance with the policies of the Article 28 sponsor that includes:

- Maintaining adequate security and control over the requisitioning and dispensing of all medications and pharmaceutical supplies; and
- A record of inventory and dispensing of all medications and related supplies.

Physical inventories of medications and sensitive pharmaceutical supplies kept on site at the SBHC must be conducted at least quarterly or more frequently as the sponsor's policies may require and verified in writing by the medical staff (e.g., medical director, nurse practitioner, nurse of the SBHC). Policies and procedures must also include the reconciliation of inventory discrepancies as needed and disposition of expired medications. All physical inventories must be kept at the SBHC site and available for review by the Department or its agent (currently the Island Peer Review Organization IPRO) as requested.

Please share these requirements with SBHC program managers and staff in your organization. An attestation of compliance with the *Principles and Guidelines* will continue to be required in conjunction with the opening of new SBHC sites and is incorporated within the annual SBHC sponsor certification form.

In those circumstances in which SBHCs store student-supplied medications, the Department recommends that the SBHC document all student-supplied medication transactions, including the following:

- Date, name and quantity of each medication received by the SBHC from the parent or guardian;
- Parent or guardian contacts made by the SBHC regarding expired or unused medication;
- Date, name and quantity of each medication returned by the SBHC to the parent or guardian; and
- Date, name and quantity of any medication disposed of by the SBHC.

All SBHC sites must provide all written policies and procedures for the security, control and management of sponsor-supplied medications and related pharmaceutical supplies, disposition of expired medications, and documentation of such disposition upon on-site review by the Department or agent. Lack of policies and procedures for medication and related pharmaceutical supply inventory and failure to perform consistent checks will result in a request for a Corrective Action Plan to be submitted to the Department.

Thank you for continuing to provide quality care to patients of your SBHC.

Sincerely,



Lauren J. Tobias  
Director  
Division of Family Health

CC: New York State School Based Health Center Alliance  
Regional Office Directors