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VIA: Susan Schroeder, Director
Bureau of Quality Assurance

Medication Administration by Unlicensed Assistive Personnel (UAPs)

There is a shortage of nurses in today’s healthcare workforce. This has caused regulated entities to consider alternative staffing models, including the use of Unlicensed Assistive Personnel (UAPs), typically nursing assistants, to administer medications. This approach is subject to the regulations under which the entities operate. It is also subject to the laws and regulations that define the scope of nursing practice and the obligation of nurses to exercise professional judgment when delegating nursing duties to UAPs and supervising UAPs in the performance of delegated duties.

The Bureau of Quality Assurance (BQA) has received many questions related to medication administration, including the circumstances under which a registered nurse (RN) may delegate to UAPs, what training is required, and what amount of RN supervision is required. The answers to these questions may depend on the setting, patient or resident characteristics, training of the personnel, and applicable regulations. To address some of these questions BQA has

developed a document that lists state and federal regulations for various facilities and requirements based on those regulations.

The attached document is titled [Medication Administration Delegated by Registered Nurses to Unlicensed Assistive Personnel](#). This document supercedes BQC memo 92-066 and is available on the internet at <http://dhfs.wisconsin.gov>. The document lists entity regulations and requirements that may limit the delegation of various duties or tasks. It also provides information that RNs should consider when delegating medication administration to UAPs. **This document does not address specific scenarios or situations, but does include resource references that registered nurses can use to determine if delegation to UAPs is appropriate. This document also reviews the Board of Nursing publications in the Wisconsin Regulatory Digest.**

The tables following, [Guidelines For Registered Nurses Delegating Medication Administration to UAPs](#), provide the regulations and interpretations that currently exist that affect registered nurses who are delegating medication administration. The tables list the regulations based on the facility licensure type.

[Enclosure](#)