My name is Alicia Bryant and I am the Director of Health Services for Barnstable Public Schools. I am tentatively optimistic about the proposed changes to 105 CMR 210, however I hope for the sake of the Commonwealth’s school nurses that a number of issues are taken into consideration and addressed prior to adoption and/or implementation of revised regulations.

1. When medications are delegated by a school nurse, the nurse is doing so under his/her license. If emergency medications are going to be allowed to be administered by unlicensed personnel without consultation by a school nurse and something goes wrong, will that nurse be held liable?
2. What happens if staff refuse to be trained? What about contracted providers (e.g. bus drivers)? Multiple parents in today’s public hearing spoke to the need for access to emergency medications on buses. Many districts contract with bus companies, and the drivers are not district employees. Do we have delegating authority over non-district personnel?
3. Out of state field trips - we have recently received an advisory that we cannot delegate to unlicensed personnel out of state. Does the department expect a nurse to attend every out of state field trip to administer emergency medications?
4. More than once an “approved training program” is referred to in the proposed regulations. Will this training be finalized and available before any new regulations are put into effect?

Again, I am cautiously optimistic about the proposed changes, as it will make staffing for field trips one less thing to have to manage to the extent we have to manage now. That being said, I hope all aspects of the updates are considered from the lens of the school nurse and the school nurse leaders/medication program managers, who will be the ones putting these changes into effect.

Sincerely,

Alicia Bryant, MSN, RN, NCSN