**From:** Dmdebetta

**To:** [DPH-Testimony, Reg (DPH)](mailto:RTestimony@MassMail.State.MA.US)

**Subject:** 105 CMR 210.000 – Administration of Medications in Schools

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To whom it may concern:

In the context of the Public Hearing relative to proposed amendments to 105 CMR 210.000: *The administration of prescription medications in public and private schools*, it is my wish to provide public commentary.

As friend to several families of students with life-threatening medical conditions including both Type 1 Diabetes and seizure disorders, I want to relay my support for changes within 105 CMR 210.000 to expand life saving care to those students in both public and private school settings so that all students can safely attend all aspects of school life.

I strongly urge the Department to consider expanded regulation to allow trained school personnel to administer life-saving Type 1 diabetes medication such as glucagon, baqsimi and similar medications to students who may require medical intervention, instead of restricting it to nurse administration only. Current regulations require nursing team leaders to train and delegate staff for medication administration for other medications and situations. Type 1 diabetes related medications should not be excluded as they are not complicated and there are times when there may not be a licensed nurse readily available to administer. This puts students requiring these interventions at risk, as well as the possibility of exclusion from certain student activities that take place within the school community (extracurricular, field trips etc).

I also urge the department to consider expanded regulation around carrying of seizure medications/emergency rescue medications to travel with and be administered for a student at all times, including bus travel as well as any other settings within the life of the school currently prohibited. A student should never be separated from the medication that can be the difference between life and death for that student. They should be afforded all the same opportunities to participate in every aspect of school life and not restricted by the need for a medication/medical intervention promptly.

I thank you for the opportunity to comment publicly in support of these very important issues and appreciate the department’s consideration for amendments that will support students with these medical challenges who deserve to be a part of all that the school life has to offer for the entire school community.

Respectfully yours, Donna DeBetta-Pierre 86 West Street

Uxbridge, MA 01569