Re: Comments on Proposed Amendments to 105 CMR 210.000

To whom it may concern:

As the mother of a child with type 1 diabetes who attends public school in Massachusetts, I would like to thank the Department of Public Health for your leadership in introducing critical updates to 105 CMR 210.000: *The administration of prescription medications in public and private schools*.

When my daughter was diagnosed with Type 1 Diabetes last year, one of prescription medications that we were educated on and left the hospital with was emergency glucagon. While this treatment has been available for many years, significant advancements were made in 2019 with the approval and release of ready-to-use emergency glucagon. These currently are available as Autoinjectors and as Nasal Glucagon, both of which are designed to be easy to use in an emergency. I was surprised to learn that Massachusetts is one of the only states that does not allow for administration of this treatment to be delegated, and I am grateful for this proposed amendment that could help to save the life of my daughter or another child with Type 1 diabetes.

While I appreciate the thoughtful updates to 105 CMR 210, I have detailed several suggestions below:

**210.002: Definitions**

Emergency Rescue Medication: This definition includes a number of examples of these medications but does not reference glucagon. I strongly urge you to include glucagon as an example within this section to ensure this is visible and clear.

**210:004 (A) (4)**

This section indicates that parenteral medications shall not be delegated with several exceptions, including epinephrine. To ensure life-saving glucagon is available to all students that are in need, I strongly recommend including Glucagon autoinjector as an exception in this section as well. This formulation is called Gvoke Hypopen and is designed similarly to an EpiPen, with a very high ease of use and low risk.

Thank you for this opportunity to present comments on the proposed amendments to 105 CMR 210.000 and for your consideration of the requested revisions.

Please feel free to contact me with any questions.

Sincerely,

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