**From:** Susannah Hann

**To:** DPH-Testimony, Reg (DPH)

**Subject:** Feedback on Proposed changes to 105 CMR 210

**Date:** Thursday, February 13, 2025 3:51:46 PM

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# During the public hearing, we heard many parents and professionals advocating for teaching valtoco and basquimi. I urge you to consider having unlicenced personel administer these emergency medications after being taught rather than delegated to. I think that it is very important IF we have delegation of emergency medications to be very clear that the medication is being administered on the nurse's license and that the school nurse has to be in agreement with each part of the plan both in the law and in clear statements from DPH and DESE. The pressure on school nurses will be enormous.

If a school nurse delegates medications, they need to be on call. Given the amount of extracurriculars, this on call coverage would be long hours and 7 days a week. Please allow teaching/emergency plans rather than delegation of these emergency medications for students with diabetes and seizures so that we can retain experienced school nurses. I am concerned about the turnover of school nurses who are already burned out if this liability is placed upon them.

All the best, Susannah

Susannah Hann, MEd, BSN, RN, NCSN Director of Health Services

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