

**Policy 2422.8: Medication Administration
 Comment Log
 October 10, 2013 to November 12, 2013**

	<u>Action</u>	<u>Type</u>
N:	No Response	- Negative
NA:	Not Accepted	+ Positive
A:	Accepted	o Neutral

Date	Individual/Organization	Comments	Action/ Type	Rationale
		§126-27-1. General.		
10-16	Deborah Wright Charleston WV	Can you imagine having to watch a child DIE because an Epi pen was not available??? How traumatic for everyone involved - the child, the child's family, the children and professionals that might witness a death!! YES they and bus drivers should all be trained!!!! Why has this NOT been the standard before? I am an adult. Started having reactions at age 56! I carry an Epi pen - training and use is soooo easy - you can inject right through clothing, hold for 10 seconds - NO BRAINERanyone may have a FIRST allergic reaction - no time to go get a prescription - this could save a LIFE - child or adult!!!	N	+
10-16	Sharon M. Holley Private Citizen Milton WV	My nephew has severe peanut allergies. His mother has to carry an EPI pen everywhere she goes and make sure that his teacher has one at school. These allergies are life threatening. Unfortunately, there is no test given to young children to determine whether or not they have peanut or other life-threatening allergies. A parent is unaware of this until the child is exposed to the source of the allergy. The first time this happens is terrifying for the child and the	N	+

		parent. If the first exposure happens at school, then no provisions have been made by the parents with the school for the child's health safety. Every school should have these pens available for use at all times. Peanut allergies, particularly, seem to be on the rise among young children. Most of WV is rural and totally dependent on volunteer medical personnel provided through volunteer fire stations. By the time these volunteers make it to the department, man the ambulance and get to the school, a child could die. Millions of dollars are wasted each year in the state of WV for frivolous things that are only important to the politicians of the state. It is time that measures are taken to insure the health safety of our children. Please pass this measure and provide the needed health safety articles for every school in the state of WV.		
10-29	Vicki Bumgarner BSN,MA,NCSN Wood County School Nurse Vienna WV	In the Overview statement explaining what section 6.4e is it states "Students should not attend school without both in place as this "is" child neglect and "can" lead to a tragic outcome "for" the student. I am supportive of the stong language, however, the same language needs to be in the section 6.4 itself. "Could", "should, in this section needs to be replaced with "must" or "will".	A	+ Language added throughout 6.4 to reflect consistency in policy language.
11-12	Margaret Miltenberger Extension Agent WVU Extension Service Keyser WV	School calendar change - how will state parks in West Virginia maintain their budgets with this new school calendar????	N	o
		§126-27-2. Purpose.		
10-16	Deborah Wright Charleston WV	to save lives.....	N	+
10-29	Vicki Bumgarner BSN,MA,NCSN Wood County School Nurse Vienna WV	2.1 If these are the standards that MUST be followed, then	NA	o

		§126-27-3. Application.		
		No comments received		
		§126-27-4. Definitions.		
10-29	Vicki Bumgarner BSN,MA,NCSN Wood County School Nurse Vienna WV	means a health care procedure that provides medication by mouth, topically, or by another route as designated by written or standing orders from a licensed prescriber. Not clear what the difference between administrator's designee and designated qualified personnel is 4.67 Licensed health care provider means "an" allopathic physician 4.11 Medication document means the individual medication record or "medication" log...	A	o The suggested language was added to Section 4.1 to clarify definition of "Administration of medication". Language added in Sections 4.5. "Designated qualified personnel" to clarify they administer prescribed medications under the training and delegation of the certified school nurse. Inserted the word "an" in front of allopathic. Replaced the word "medicine" with "medication".

		§126.27-5. Authorization.		
		No comments received		
		§126.27-6. Role and Responsibilities.		
10-14	Sharon Knight 3rd grade teacher Taylor County Schools Flemington WV	As a teacher, I have given fluoride rinse before and it is just a waste of time. With everything else that the elementary teacher has to do, this is not important. I am too busy and have too many Next Gen Standards, technology, writing, character ed, and all other new and innovative things to teach that the BOE has added to my curriculum. Parents can do something to raise their children...take them to the dentist.	N	-
10-29	Vicki Bumgarner BSN,MA,NCSN Wood County School Nurse Vienna WV	Section 6.4 Provide school with completed licensed prescriber authorization form for prescribed medications...and at least two telephone numbers "other than those of parent/guardian" in case of emergency. Section 6.4 If emergency medication or authorization form is not provided...The section 504 "must" regard the lack of emergency medication as child neglect. However, what is in place from a DHHR standpoint? And if a 504 or IEP is in place and legally binding,, it is applicable to both parties.	A	+
		§126.27-7. Administration of Prescribed Medication.		
10-29	Vicki Bumgarner BSN,MA,NCSN Wood County School Nurse	7.1 Need to put "from licensed prescriber and parent/guardian" back into the statement	A	+
				Strike through language

	Vienna WV			kept in Section 7.1 to clarify process for administering prescribed medication
11-12	Tamra L. Hansford School Nurse Mineral County Schools Keyser WV	School staff should not be allowed to make a decision about someone having an anaphylactic reaction and in turn, give them the epipen. Nurses have appropriate training and experience to back up their decisions; and we did not get our degrees and decision making skills overnight, contrary to some beliefs! I will refuse to take this upon my nursing license. It is bad enough staff do not have the appropriate training to administer medication - a CNA trained as a med aid has 40 hours of training! The staff giving medications needs to have more in depth training. It takes a nurse years to complete schooling and you are asking us to train said staff and rely on their decision making skills when we had nursing experience to go into the decisions we make.	NA	- School health functions within the education model which follows the Chapter 30 for licensure laws, the WV Nurse Practice Act along with Chapter 18 of legislative rules, State Board of Education rules and WVDHHR/BPH rules as well.
		§126-27-8. Administration of Non-Prescription Medication.		
10-29	Vicki Bumgarner BSN,MA,NCSN Wood County School Nurse Vienna WV	8.5 Needs to read exactly like 7.43. Medication administration incidents include...deviation from the instructions of the "Licensed health care provider", not parent/guardian. I am afraid the use of NON-prescription medication is being used instead of "over the Counter" medication. Can non prescription	NA A	o This section is related to county policies allowing nonprescribed over-the-counter medication with parent/guardian permission not licensed health care provider orders. +

		<p>include prescription medication that is not prescribed for an individual ie. siblings using same inhaler. or is it referring to the strength of a product.</p> <p>8.5.4 As a nurse, I do not want the responsibility of determining the safety of multiple medications given to a student. This is for the doctor alone. This validation process "must require" written communication between physician and nurse and the possibility of requiring a licensed prescriber order.</p>	NA	<p>The language of nonprescribed "over-the-counter" medication was incorporated throughout the policy to ensure clarity and understanding.</p> <p>o</p>
		<p>§126-27-9. Medication Storage, Inventory, Access and Disposal.</p>		
10-17	<p>Amy Foster Parent Parent Barboursville WV</p>	<p>I would love for my son's school to be able to stock free epipens. He has severe food allergies and I have to pay out of pocket for his current epipens that I then leave at his school. My out of pocket expense is \$267 to stock this at the school. If this policy would go thru it would greatly help me and my family as well as possibly save a child's life at school. Many individuals do not realize or understand the ramification of a child who suffers from food allergies and not having enough of the epipen medications available. The epipens are free to the schools so why not have them ready and available if ever needed in such an emergency situation. Please pass this for my child as well as all the children who may benefit from having these on hand.</p>	N	<p>+</p> <p>Although stock epinephrine can be used for any student or staff member, the parent/guardian is still responsible for providing the epinephrine auto-injector for students with known anaphylactic shock. This will prevent a possible "out-of-stock" issue for all and assure medications are on-hand at all times for those with</p>

				known anaphylactic reactions.
10-29	Vicki Bumgarner BSN,MA,NCSN Wood County School Nurse Vienna WV	9.1 Epinephrine is to be stored in a secure, Unlocked? location. 10.3 Again, is this unlocked?	A	+ Inserted the word “unlocked” into section 10.3 for consistent language.
		§126-27-10. Emergency Medication.		
10-16	Jeana Stonestreet Hurricane WV	As a parent of a child with food allergies, I am in favor of the new policy to allow stock epinephrine pens in our schools. My son has a doctor's order for his medication but his younger brother does not. He is at a higher risk for an allergic reaction but does not have a diagnosed allergy at this time. I would like to make sure that if he does have a severe allergic at school that there would be medication to save his life. A lot of children are exposed to foods for the first time at school or could have their first bee sting on the playground. We need to be proactive and pass this policy before we have a tragedy like what has happened in many other states. This will save lives!	N	+
10-17	Autumn Ryan Rivesville wv	This can and will save kids lives, please stock epi pens in Marion and Mon County schools. Thank you	N	+
10-18	Christy Tobias Morgantown WV	Stock Epi Pens!!!! For emergency allergy situations ! It can save a kids life!	N	+
11-12	Tamra L. Hansford School Nurse Mineral County Schools Keyser WV	School staff should not be allowed to make a decision about someone having an anaphylactic reaction and in turn, give them the epipen. Nurses have appropriate training and experience to back up their decisions; and we did not get our degrees and decision making skills overnight, contrary to some beliefs! I will refuse to take this upon my nursing license. It is bad enough staff do not have the appropriate training to administer medication - a CNA trained as a	NA	-

		med aid has 40 hours of training!		
		§126-27-11. Confidentiality, Documentation and Reporting.		
10-29	Vicki Bumgarner BSN:MA:NCSN Wood County School Nurse Vienna WV	11.2 I do not think we need to call Poison Control every time there is a med error. Especially, if the error did not result in any untoward effect to student. Perhaps the report could be done online, similar to health department reports, on a monthly basis. or report if student experienced an untoward effect.	NA	-
		§126-27-12. Consequences of Policy Violation.		
		No comments received		
		§126-27-13. Severability.		
10-29	Vicki Bumgarner BSN:MA:NCSN Wood County School Nurse Vienna WV	I do not think Severability section is necessary. Compliance with WV Code 5310 and 5902 in the previous section is enough to emphasize the importance of confidentiality.	NA	o