

**WEST VIRGINIA
SECRETARY OF STATE**

JOE MANCHIN, III

ADMINISTRATIVE LAW DIVISION

Form #5

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WEST VIRGINIA
SECRETARY OF STATE

**NOTICE OF AGENCY ADOPTION OF A PROCEDURAL OR INTERPRETIVE RULE
OR A LEGISLATIVE RULE EXEMPT FROM LEGISLATIVE REVIEW**

AGENCY: West Virginia Board of Education TITLE NUMBER: 126

CITE AUTHORITY: W.Va. Constitution, Article XII, § 2, W.Va. Code §§18-2-5, 18-5-22, 18-5-22a, 30-7-1 and 30-7a-1

RULE TYPE: PROCEDURAL _____ INTERPRETIVE _____

EXEMPT LEGISLATIVE RULE X

CITE STATUTE(S) GRANTING EXEMPTION FROM LEGISLATIVE REVIEW

W.Va. Code §§ 29A-3B-1, et seq.; W.Va. Board of Education
v. Hechler, 180 W.Va. 451; 376 S.E.2d 839 (1988).

AMENDMENT TO AN EXISTING RULE: YES X NO _____

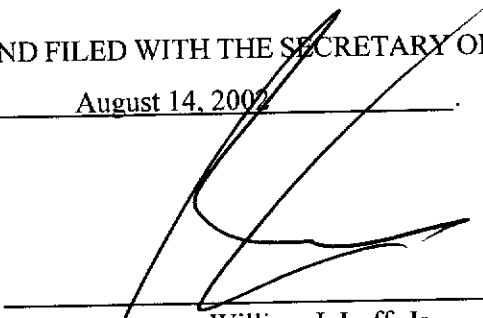
IF YES, SERIES NUMBER OF RULE BEING AMENDED: 25A

TITLE OF RULE BEING AMENDED: Standards for Basic and Specialized Health Care
Procedures (2422.7)

IF NO, SERIES NUMBER OF NEW RULE BEING PROPOSED: _____

TITLE OF RULE BEING PROPOSED: _____

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS August 14, 2002



William J. Luff, Jr.
Deputy State Superintendent of Schools

SCANNED

EXECUTIVE SUMMARY

Standards for Basic and Specialized Health Care Procedures Policy 2422.7

BACKGROUND:

During the 2002 legislative session, W.Va. Code §18-5-22 was amended to allow for secretaries to administer medications. Last year the West Virginia Board of Education placed on public comment a policy that would have allowed secretaries to administer medications, but the public comments indicated strong opposition to this practice. The opposition focused on the fact that the procedure of medication administration would no longer be considered a "specialized" procedure and that secretaries worked in an office environment that allowed for many distractions that could interfere with safe medication administration.

During the comment period, the Executive Director of the Office of Healthy Schools met with the WV Board of Examiners for Registered Nurses to explain the law and policy changes. The Board expressed some concerns with the changes of the policy. A total of eight comments were received throughout the comment period and one minor change has been made in response to recommendations made by the WV Board of Examiners for Registered Nurses.

PURPOSE:

Because the law has changed, the purpose of the amendment to this policy is to define secretaries, along with aides and teachers, as individuals who can be delegated to perform the specialized health care procedure of medication administration. The policy also clearly outlines the responsibility of the school nurse to determine who can give medications, the training needed for these individuals and the safety precautions needed to assure that the medications are safely administered.

IMPACT:

With so few nurses available to meet the medication administration needs of students, additional assistance is necessary. When secretaries are properly trained, and provided an environment free from distractions, they can safely administer medications. However, the school nurse has the ultimate responsibility for safe medication administration and must determine that the individual to whom this procedure is delegated is competent to perform the procedure and can do so in an environment that allows for full attention to be paid to the duty.

Secretaries who elect to be trained to administer medications, and who have this duty assigned, are entitled to receive one pay grade higher than their current assignment.

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TITLE 126
LEGISLATIVE RULE
BOARD OF EDUCATION

SERIES 25
STANDARDS FOR BASIC AND SPECIALIZED
HEALTH CARE PROCEDURES (2422.7)

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WEST VIRGINIA
SECRETARY OF STATE

§126-25-1. General.

1.1. Scope. This legislative rule establishes standards for certified school nurses to assess student health needs and to decide who is best skilled to respond to them.

1.2. Authority. W. Va. Code §§18-2-5, 18-5-22, 18-5-22a, 30-7-1 and 30-7a-1.

1.3. Filing Date - July 15, 2002

1.4. Effective Date - August 14, 2002

1.5. Adoption by reference. -- Basic and Specialized Health Care Procedure Manual for West Virginia Public Schools.

§126-25-2. Purpose.

2.1. Good health is essential to student learning. This policy establishes the standards that must be followed in providing for students with health care needs. The resulting Basic and Specialized Health Care Procedure Manual for West Virginia Public Schools was designed for use by certified school nurses in West Virginia to assure safe, consistent provision of health care.

§126-25-3. Definitions.

3.1. Basic Health Care Procedures are defined as procedures performed by school personnel to ensure that health and safety needs of students are met.

3.2. Cardiopulmonary Resuscitation (CPR) is defined as possession of a current valid certificate from an approved training program for adult, child and infant CPR, e.g. American Heart Association/American Red Cross.

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3.3. School Health Manager is defined as a certified school nurse who reviews and interprets medical data for health-related problems of the students and who coordinates all school health services.

3.4. Certified School Nurse is defined as a registered professional nurse, who is licensed by the West Virginia Board of Examiners for Registered Professional Nurses (W.Va. Code §30-7-1, et seq.), who has completed a West Virginia Department of Education approved program as defined in Policy 5100 and meets the requirements for certification contained in Policy 5202. The certified school nurse must be employed by the county board of education or the county health department as specified in W.Va. Code §18-5-22.

3.5. Health Assessment is defined as the process in which the certified school nurse obtains student data. This assessment is comprehensive, systematic and continuous to allow the certified school nurse to make a nursing diagnosis and plan for interventions with the student, family, school staff and physician when necessary.

3.6. Health Care Plan is defined as the written document developed by the certified school nurse which includes a nursing diagnosis, is individualized to the student's health needs and consists of specific goals and interventions delineating the school nursing actions, delegated procedures and student's role in self care.

3.7. Licensed Practical Nurse is defined as a person who has met all the requirements for licensure as a practical nurse and who engages in practical nursing as defined in W.Va. Code §30-7a-1, et seq.

3.8. Performance Check List is defined as a tool used by the certified school nurse in determining that a school employee meets the minimum standards required to perform specialized health care procedures safely.

3.9. Qualified is defined as the ability to demonstrate competence and skills in the use of equipment and performance of techniques and procedures necessary to provide specialized health care services for individuals with health needs and to demonstrate current knowledge of community emergency medical resources.

3.9.1. Qualified, for the certified school nurse, or other registered nurse or licensed practical nurse, shall mean trained in the procedures to a level of competence and safety which meets the objectives of the training and the standards of practice of the profession.

3.9.2. Qualified, for the designated school personnel, shall mean trained in the procedures to a level of competence and safety which meets the objectives of the training.

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The training shall be provided by the certified school nurse or an approved program that meets training criteria.

3.10. Related Services are defined as transportation and such developmental, corrective, and other supportive services as are required to assist an eligible exceptional student to benefit from education as defined in Policy 2419. The term includes, but is not limited to, audiology, speech and language pathology, psychological services, physical and/or occupational therapy, counseling/social services, school health services, early identification and assessment, medical services for diagnostic or evaluation purposes, and parent training.

3.11. School Employee as defined by W.Va. Code §18-5-22 means teachers, as defined in W.Va. Code §18-1-1, and aides, as defined in W.Va. Code §18A-4-8. School employee shall also mean Secretary I, II and III as defined in §18A-8-4 for the sole purpose of administering medications.

3.12. Specialized Health Care Procedures are defined as procedures prescribed by the student's licensed physician(s) requiring medical and/or health-related training for the individual who performs the procedures.

3.13. Standardized Procedures are defined as those protocols and procedures outlined in the Basic and Specialized Health Care Procedure Manual for West Virginia Public Schools. They constitute the minimum safe standards of practice that are utilized in the provision of basic and specialized health care procedures.

3.14. Supervision of Designated School Employees is defined as periodic on-site review by the certified school nurse and shall include review of the competence of that individual in performing the specialized health care procedure and maintaining appropriate records.

3.14.1. Immediate Supervision. A certified school nurse shall be physically present while a procedure is being administered to review, observe and/or instruct the designated school employee's performance of health care services.

3.14.2. Direct Supervision. A certified school nurse shall be present on the same school campus as the employee being supervised and available for consultation, and/or referral for appropriate assistance.

3.14.3. Indirect Supervision. A certified school nurse shall be available to the qualified, designated school employee, either in person or through electronic means to provide necessary instruction, consultation, and/or referral for appropriate assistance.

3.15. Training is defined as preparation for the performance of basic and specialized health care procedures.

§126-25-4. State Administrative Procedures.

4.1. Standards of Performance of Care.

4.1.1. The Basic and Specialized Health Care Procedure Manual for West Virginia Public Schools shall be utilized as the minimum standard for safe practice as adopted by the State Division of Health in the Specialized Health Procedures in Public Schools Rule, 64 W.Va. CSR 66, 1992.

4.2. Training Program. Beginning with July 1, 1989, any new employee in the field of special education and all teachers and aides in special education or regular education who provide basic health care procedures for students with special health needs, shall be required to undergo Phase I training or demonstrate competency in performance of Phase I procedures that are applicable to their job assignment. In addition, applicable Phase II training will be required for all school employees performing specialized health care procedures.

4.2.1. Phase I.

a. All employees defined in Section 4.2 must be trained in: Proper hand washing; handling and disposal of body fluids including use and removal of gloves; Body mechanics; Basic first aid including Heimlich Maneuver and CPR; Other basic health care procedure training will be individualized as applicable to employee job assignment.

4.2.2. Phase II.

a. Individualized training in the performance of any one or more specialized health care procedures as applicable to employee job assignment.

4.3. Trainer.

4.3.1. Training and retraining must be provided and/or coordinated by a certified school nurse.

4.4. Performance Assessment.

4.4.1. An assessment of the performance of each procedure shall be completed by the certified school nurse. This assessment shall include the completion of a critical skills performance check sheet and shall be conducted in relation to changes in student health care needs, physician's orders and medical/health technology.

4.5. Supervision.

4.5.1. The category of supervision required (direct or indirect) in each situation shall be determined by the certified school nurse.

4.6. Training.

4.6.1. Training shall be provided through simulation or use of training models. Initial practice of the procedure shall be simulated or done on models rather than the student, whenever possible.

4.7. Retraining.

4.7.1. Personnel shall be retrained every two years on performance of each specialized health care procedure (beginning 1990-91) that is currently prescribed and being performed by said personnel.

§126-25-5. Organization and Management.

5.1. Personnel Certification.

5.1.1. School employees will be certified for completion of training in Phase I and Phase II as applicable.

a. Phase I certification must assure:

A. Completion of the training program stipulated for all employees defined in Section 4.2, plus those additional procedures necessary for individual job assignment.

B. Demonstrated competency in basic procedure(s) to be performed.

b. Phase II certification must assure:

A. Completion of Phase I as required and applicable to individual job assignment.

B. Completion of training in each individual specialized health care procedure to be performed.

C. Demonstrated competency based on a critical skills performance check sheet.

5.2. Training.

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5.2.1. The Basic and Specialized Health Care Procedure Manual for West Virginia Public Schools must be used for teaching and training basic and specialized health care procedures. The training may be provided by:

- a. Schools of nursing
- b. Vocational schools
- c. Independent faculty approved by school nurse
- d. Certified school nurses

5.3. Changes.

5.3.1. Updating of these Rules will be done by the Council of School Nurses, as outlined in §126-25-8.

§126-25-6. System for School Admission and Care.

6.1. Admission.

6.1.1. For students needing specialized health care procedures, the certified school nurse shall assess the student, review the orders from the health care provider with such authority, and assure implementation of needed health and safety procedures. This assessment shall be completed prior to initial school attendance, and following any absence in which a health condition may have changed, necessitating reevaluation.

6.2. Health Care Provider Orders.

6.2.1. The orders from the health care provider with such authority are kept on file in the student's permanent record. These orders are valid for a maximum of one year, unless changed by the health care provider.

6.3. Delegation.

6.3.1. Certified school nurses shall determine delegation of any aspect of specialized health care.

§126-25-7. Health Care Plan.

7.1. Health Care Plan.

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7.1.1. The health care plan must be prepared by the certified school nurse based on assessment of student and/or physician's written orders (see definition).

7.2. Assignment.

7.2.1. A review of the health care plan will be conducted with staff member(s) assigned by administrator to carry out the plan.

7.3. Contents.

7.3.1. The plan should contain:

- a. Nursing assessment
- b. Nursing diagnosis
- c. Goals and expected outcomes
- d. Interventions
- e. Evaluation

7.4. Review.

7.4.1. Health care plans are reviewed annually or more frequently as the student's condition warrants.

§126-25-8. Quality Assurance.

8.1. A needs assessment developed, implemented and analyzed by the Council of School Nurses shall be the basis for revision of the Basic and Specialized Health Care Procedure Manual for West Virginia Public Schools.

8.2. The Council of School Nurses shall meet at least bi-annually, or more frequently, as deemed necessary by the Chair of the Council in consultation with the West Virginia Department of Education for review of certification and training program regarding school employees.

8.3. The certified school nurse shall participate in continuing education programs which provide:

8.3.1. The training needed related to new specialized health care procedures.

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8.3.2. Staff development applicable to effective school health practice.

§126-25-9. School Health Records.

9.1. Confidentiality.

9.1.1. All records are confidential and shall not be released except under existing West Virginia Board of Education policies.

9.2. Documentation.

9.2.1. A log will be maintained for each student needing a specialized health care procedure. It will include date and time procedure was performed, any notes on events and/or interactions and signature of person performing/supervising procedure.

§126-25-10. Staffing Requirements.

10.1. Staffing.

10.1.1. Certified school nurses must be employed in sufficient numbers to ensure adequate provision of services to severely handicapped pupils. Registered nurses have the authority and the ability to teach and to supervise other persons in rendering selected health services and/or procedures.

10.2. Certified School Nurse.

10.2.1. The certified school nurse must have a current license as a registered professional nurse in the State of West Virginia (W.Va. Code §30-7-1, et seq.). The school nurse must be certified as a school nurse by the West Virginia Department of Education (Policy 5202). The certified school nurse must be employed by the county board of education or the county health department (W.Va. Code §18-5-22) which contracts to provide equivalent services to boards of education. Performance of professional nursing service means both independent nursing functions and health related services which require specialized knowledge, judgment, and skills as governed by the West Virginia Nurse Practice Act (W.Va. Code §30-7-1, et seq.) and the National Association of School Nurses, Inc. "Standards of Professional School Nursing Practice".

10.3. Licensed Practical Nurse.

10.3.1. The practical nurse must be currently licensed in the State of West Virginia (W.Va. Code §30-7a-1, et seq.) and must function under the supervision of the

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registered professional nurse or licensed physician. The practical nurse shall not function as a school nurse.

10.4. Other School Personnel Providing Health Related Services.

10.4.1. Medical contacts, referrals and interpretations of medical data shall be managed by the certified school nurse. The nurse serves as the manager for health related problems and decisions. In the role of manager, the nurse is responsible for standards of school nurse practice in relation to health appraisal and health care planning. School employees, with the approval of the principal and the county board of education, may elect or in some cases be required to provide approved specialized health care procedures and such procedures shall be delegated by the certified school nurse as deemed appropriate. The school nurse shall provide for training, retraining, and supervision, and, upon completion, certify satisfactory level of competence before school employees perform certain health care procedures.

10.5. Liability.

10.5.1. A physician and/or professional nurse may be held liable for delegating professional responsibilities to individuals not qualified to perform them.

§126-25-11. Student Rights.

11.1. Assignment.

11.1.1. Students are entitled to the assignment of qualified personnel.

11.2. Rights.

11.2.1. Students are afforded the right to privacy, dignity, respect and courtesy, in accordance with Student's Privacy Act.

§126-25-12. Penalties.

12.1. Compliance.

12.1.1. Failure of any school personnel to comply with the above rules will result in personnel disciplinary actions based on state and local Board of Education policy.

§126-25-13. Administrative Due Process.

13.1. Parents/Legal Guardians.

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13.1.1. Families dissatisfied with the health care plan and its handling by personnel should:

- a. Schedule a meeting with the certified school nurse and school principal or designee.
- b. Follow due process procedure as outlined by the WV Board of Education.
- c. Appeal unacceptable outcomes at the third step to the State Superintendent of Schools.

FISCAL NOTE WORKSHEET

(Submit 4 Copies)

HD NO _____ DRAFT NO _____ BILL NO _____ RESOLUTION NO _____

SUBJECT Basic and Specialized Health Care Procedure Manual Policy 2422.7 FUND _____

SOURCE OF REVENUE: GENERAL FUND SPECIAL OTHER (SPECIFY) _____

COST OF ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

INCOME ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

SHOW OVER-ALL EFFECT IN ITEMS 1 AND 2 & GIVE EXPLANATION OF BREAKDOWN BY FISCAL YEAR INCLUDING LONG-RANGE EFFECT

EFFECT OF PROPOSAL	ANNUAL		FISCAL YEAR		
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
1. ESTIMATED TOTAL COST	\$ 159,028	\$	\$ 159,028.	\$	\$
PERSONAL SERVICES CURRENT EXPENSES REPAIRS/ALTERATIONS EQUIPMENT OTHER	\$ 0.00	\$	\$ 0.00	\$	\$
2. ESTIMATED TOTAL REVENUES	\$ 0.00	\$	\$ 0.00	\$	\$

3. EXPLANATION OF ABOVE ESTIMATES (INCLUDING LONG-RANGE EFFECT):

Calculation Factors:

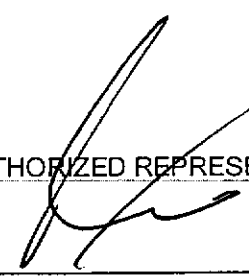
Number of schools	818
Assume 1/3 will have a secretary performing these duties	273
Average incremental pay increase	\$ 47.00

Estimated Cost:

For the 2002-03 Year:

Secretaries with specialized health care procedures	
Step 2 increase	\$ 128,310
Step 3 increase at 8.94%	11,471
Retirement increase at 15%	<u>19,247</u>

Total estimated cost of this proposal \$ 159,028

DATE 5/17/02 AGENCY West Virginia Department of Education AUTHORIZED REPRESENTATIVE 

**POLICY 2422.7: STANDARDS FOR BASIC AND SPECIALIZED HEALTH CARE PROCEDURES
COMMENT LOG**

June 7, 2002 - July 7, 2002

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

Date	Individual/Organization	Comments	Action/Type	Rationale
6/14/02	Sue Peros, RN School Nurse Boone County Schools	<p>§126-25-1. General.</p> <p>After reviewing the policy on review re: Specialized Procedures, my comments:</p> <p>This policy would address the new legislation on Medication Administration effectively. I appreciate how that it continues to provide for the school nurse to determine who and where the safest environment is, for such administration in the schools.</p> <p>Thank you.</p>		
6/21/02	Janice Greene, RN School Nurse Kanawha County Schools 200 Elizabeth Street Charleston, WV 25311	Does this policy include clerks?		
6/21/02	Teresa Bayer School Nurse Wood County Schools	Policy 2422.7 appears well written. Thank you for the opportunity to comment on this policy.		

Date	Individual/Organization	Comments	Action/ Type	Rationale
7/5/02	Betty J. Maxwell School Nurse P. O. Box 218 Lost Creek, WV 26385	Nineteen years of experience as a school nurse has convinced me that school secretaries are not the group of individuals that should be giving medications.		
7/5/02	Laura Skidmore Rhodes MSN, RN Executive Director WV Board of Examiners for Registered Professional Nurses 101 Dee Drive Charleston, WV 25311- 1620	<p>The West Virginia Board of Examiners is taking this opportunity to respond to the draft of Policy 2422.7 - Standards for Basic and Specialized Health Care Procedures which is being written for the implementation of permitting school secretaries to administer medication to students. As you may recall, you and representatives of school nurses in West Virginia met with the Board in August 2001 to discuss the plan to permit school secretaries to administer medication. During this meeting you indicated to the Board that the planned legislation would not be submitted during th 2001 Legislative Session. Subsequent to the August 2001 meeting a letter was sent to you indicating the Board's strong opposition to this plan. This is mentioned in the "Background" Section of the Executive Summary attached to the Policy.</p> <p>Sometime after the March 2002 meeting of the Board and after the 2002 Legislative Session you phoned the Board office to relay the information that the law to permit secretaries to administer medication was passed. You indicated you were not aware of this occurring until the day you called the Board office and it was a last minute change to another bill.</p> <p>During the June 2002 meeting you indicated that you did receive information which indicated a change would be made during the 2002 Legislative Session. Unfortunately, this information was not shared with the Board.</p>		

Date	Individual/Organization	Comments	Action/Type	Rationale
7/5/02	<p>Laura Skidmore Rhodes MSN, RN Executive Director WV Board of Examiners for Registered Professional Nurses 101 Dee Drive Charleston, WV 25311- 1620 (CONTINUED)</p>	<p>The Board remains opposed to this change. The "Purpose" section of the Executive Summary indicates that "because the law has changed". The reading of the law lends one to determine that there is still a choice. The individual has a choice to participate and this would seem, then, that the school has a choice to implement. The language does not mandate all school secretaries to participate in medication administration.</p> <p>The "Impact" section of the Executive Summary is particularly offensive to the Board. The indication is that the nursing shortage is the driving force behind this change. The driving force is failure to fund positions to hire school nurses. The Board is sure that if there were a shortage of teachers and principals, changing the job category of secretaries to facilitate teaching and administration would not occur. The implication is that all the individual would need to do would be to make sure school happens. We all know there is more to the skill of teaching and administering a school than just making sure everyone shows up. Educational and societal norms and expectations, and, common sense dictate that a certain level of educational preparation is required to gain jobs which place a person in the position of teaching our country's most valuable asset, our children.</p> <p>The same is true for the health care of our children in our schools. Attendance policies which encourage or force principals and school administration to think that the administration of medication is acceptable to keep a child in school in order to maintain a certain performance rating is a pathetic example for our children. A child with a headache may only need a glass of water, not a Tylenol. Or, they may need a trip to</p>		

Date	Individual/Organization	Comments	Action/ Type	Rationale
7/5/02	Laura Skidmore Rhodes MSN, RN Executive Director WV Board of Examiners for Registered Professional Nurses 101 Dee Drive Charleston, WV 25311- 1620 (CONTINUED)	<p>the local hospital emergency department. Our children do not need to learn that each ache and pain can or needs to be "fixed" with a medication. Our children do need to learn that medication, properly prescribed and administered, can help them maintain or re-gain a healthful state.</p> <p>Since the first laws and rules related to school nurses were written many issues related to health care needs of children in the school setting have changed. The population of children with health care needs has increased significantly over the years. There are more children on medication, requiring one to one nursing care, and requiring skilled care.</p> <p>Administering medication is more than placing a pill in the hand or mouth of an individual and providing a medium for swallowing it. Making sure the medication is correct, needed, for the right person, the right time, the right purpose; all of these are part of the process.</p> <p>Evaluating whether a student needs medication and monitoring the child for adverse effects are even more important aspects of medication administration. The potential for harm is great for a task that may seem so simple.</p> <p>The Board is very much opposed to the change to include secretaries particularly in light of the fact that this was known and is still known to the Department of Healthy Schools. At its June Board meeting the Board discussed several options related to this matter. These included seeking legal remedies to determine if the Department of Education has exceeded its legislative authority; pursuing inappropriate delegation action against individual nurses, and reporting secretaries to the prosecuting attorney for practicing nursing without a nursing license. These options are currently being reviewed by this agency.</p>		

Date	Individual/Organization	Comments	Action/Type	Rationale
7/5/02	<p>Laura Skidmore Rhodes MSN, RN Executive Director WV Board of Examiners for Registered Professional Nurses 101 Dee Drive Charleston, WV 25311- 1620 (CONTINUED)</p>	<p>As stated before, the Board is opposed to the change. Because the law provides for it to occur doesn't mean it is a requirement. It appears that the law allows for decision making by the individual and the school. The Board encourages to both deny the implementation of this procedure and related practice.</p> <p>The Board also strongly encourages the Department of Healthy Schools to talk with the Office of Health Facility Licensure and Certification (304-558-0050) regarding the program for medication administration by unlicensed assistive personnel in certain settings, and to some of the nurses who are part of this process. Under these guidelines the nurse at least has the authority to decide who is competent and who is not and can change that status anytime the nurse believes the situation has changed.</p> <p>You will be kept informed of any action the Board may take as they pursue the various options discussed. Should you have any questions or require further information please contact me at this office.</p>		
7/6/02	<p>Teresa Ryan, RN Lincoln County Schools</p>	<p>Although, as always, the school nurse retains the right and ability to decide whether or not a person is capable of performing a specialized health care procedure safely, it was rather high-handed of the those who introduced this piece of legislation to allow secretaries to administer medication after the Council of School Nurses and the Board of Examiners for Professional Nurses had studied the issue and determined it generally unsafe. We are professional nurses and face the problem of medication administration everyday. We are spread very thin and need more help; if we had thought this was a good solution we would have embraced the idea. The person(s) responsible deserves credit for the sneaky way it passed though, no one would vote against the bill since it contained our pay raises.</p>		

Date	Individual/Organization	Comments	Action/ Type	Rationale
7/6/02	Teresa Ryan, RN Lincoln County Schools (CONTINUED)	And the fact that it was a "sneak attack" is evident by the fact that the language stated that secretaries would be allowed to "dispense" medications--a term reserved for pharmacists and physicians. My fear is that some administrators will not follow guidelines and allow secretaries to continue in their other duties while also administering medications, school nurses are not always there to make sure things are done the way we know they should. Secretaries are very busy and often have more placed on them than they really have time to do. If a secretary in this situation is also supposed to be administering medications, it is easy to see how they could be placed in a situation that would lend itself to a mistake during medication administration--and a school nurse will be held responsible.		
		§126-25-2. Purpose.		
7/5/02	Betty J. Maxwell School Nurse P. O. Box 218 Lost Creek, WV 26385	Continuous interruptions make administration of medications <u>without distractions</u> next to impossible for secretaries. Having <u>only one</u> secretary in many schools, creates a problem when the secretary is absent.		
6/24/02	Brenda C. Isaac, RN Lead School Nurse Kanawha County Schools 200 Elizabeth Street Charleston, WV 25311	§126-25-3. Definitions. 3.11. - Given the explanation in the Executive Summary, properly trained secretaries can assist school nurses in medication administration. The responsibility for safety assurance, as always, remains with the certified school nurse. 3.2. As a general rule, secretaries do <u>not have</u> CPR certification. 3.11. Harrison County has up to the present time maintained that <u>only</u> teachers would be giving medications. 3.13. To create a <u>minimum safe standard</u> - secretaries time must be uninterrupted. Then a second person would need to be present to fill in for the secretary.		
7/5/02	Betty J. Maxwell School Nurse P. O. Box 218 Lost Creek, WV 26385			

Date	Individual/Organization	Comments	Action/Type	Rationale
7/5/02	Betty J. Maxwell School Nurse P. O. Box 218 Lost Creek, WV 26385	<p>§126-25-4. State Administrative Procedures.</p> <p>At the present time - secretaries are not trained to give medications. Time would have to be set aside to do this prior to this school year.</p>		
		<p>§126-25-5. Organization and Management.</p>		
7/5/02	Laura Skidmore Rhodes MSN, RN Executive Director WV Board of Examiners for Registered Professional Nurses 101 Dee Drive Charleston, WV 25311-1620	<p>§126-25-6. System for School Admission and Care.</p> <p>The following are comments relative to the procedure. Comments and recommendations in no way reflect the Board's support of the Policy. The Board shares the following:</p> <p>1.1. "Physician's orders" should be changed to "orders from the health care provider". This language will include orders from Nurse Practitioners, Dentists and other licensed health care providers with such authority.</p>		
7/6/02	Jane Ishman School Nurse Berkeley County Schools 4933 Engle Moler Road Shepherdstown, WV 25443	<p>6.3.1. Change shall to will.</p>		
		<p>§126-25-7. Health Care Plan.</p>		
7/5/02	Laura Skidmore Rhodes MSN, RN Executive Director WV Board of Examiners for Registered Professional Nurses 101 Dee Drive Charleston, WV 25311-1620	<p>The following are comments relative to the procedure. Comments and recommendations in no way reflect the Board's support of the Policy. The Board shares the following:</p> <p>The health care provider language needs to be changes as indicated in the previous section.</p>		

Date	Individual/Organization	Comments	Action/ Type	Rationale
7/5/02	Bety J. Maxwell School Nurse P. O. Box 218 Lost Creek, WV 26385	<p>§126-25-8. Quality Assurance.</p> <p>A review of the most recent health needs assessment of WV students will reflect:</p> <ul style="list-style-type: none"> a. Increased numbers of complicated medications being given the students b. Medications per inhaler & nebulizer are increasing dramatically. c. Medications are given by gastrostomy tuber. d. Many controlled drugs are now being given. Accountability will be a greater problem. e. Doctors are now ordering rectal administration of medications. f. Some medications take a few (to several) minutes to complete administration (i.e., nebulizers, tube feedings). 		
7/5/02	Betty J. Maxwell School Nurse P. O. Box 218 Lost Creek, WV 26385	<p>§126-25-9. School Health Records.</p> <p>9.1. & 9.2. Most secretaries desks are open and in view of all who enter the schools. (Confidentiality ? Security ? Documentation ?)</p>		
7/5/02	Betty J. Maxwell School Nurse P. O. Box 218 Lost Creek, WV 26385	<p>§126-25-10. Staffing Requirements.</p> <p>As a general rule, secretaries prior to the present time and amended code did not want to give medications. Most state they felt inadequate with giving medications and relieved to know they did not have to give them. Their work stations were constantly busy.</p> <p>If a school has two secretaries and the lease seniored secretary is deemed most competent by the school nurse to give medications, a real uncomfortable work environment has been created.</p>		

Date	Individual/Organization	Comments	Action/ Type	Rationale
7/5/02	<p>Betty J. Maxwell School Nurse P. O. Box 218 Lost Creek, WV 26385 (CONTINUED)</p>	<p>A teacher that is with a student most of the school day can better assess a child's health state prior to and after medication is given. The teacher is in a better position to evaluate and refer a child if they see a change in the child's physical condition and/or behavior in the classroom.</p> <p>In general terms, a secretary is with a student for a very short period of time - thus having very little time if any to observe and evaluate a child's general condition.</p>		
7/5/02	<p>Laura Skidmore Rhodes MSN, RN Executive Director WV Board of Examiners for Registered Professional Nurses 101 Dee Drive Charleston, WV 25311- 1620</p>	<p>The following are comments relative to the procedure. Comments and recommendations in no way reflect the Board's support of the Policy. The Board shares the following:</p> <p>Staffing should be improved. Money should be allocated to provide for the hiring of an adequate number of school nurses.</p>		
7/6/02	<p>Teresa Ryan, RN Lincoln County Schools</p>	<p>Current staffing is inadequate. 10.1.1 states that "school nurses must be employed in sufficient numbers..." To be adequately staffed, the school nurse to student ratio needs to be at least 1:1000 and include pre-k through 12th grade. It is absurd not to include senior high school students in the ratio; they do not suddenly stop needing school nurse services because they reach a certain age. Also, with increasing numbers of children with special needs and pre-school aged children, we need more help.</p>		

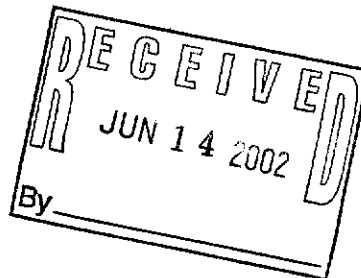
Date	Individual/Organization	Comments	Action/ Type	Rationale
7/6/02	Jane Ishman School Nurse Berkeley County Schools 4933 Engle Moler Road Shepherdstown, WV 25443	State the school nurse has the final say if person selected by County Board of Education or building administration if someone is to be trained in a specialized procedure. The nurse cannot be coerced or told someone must be trained when there is concern or evidence this is not a safe situation for the student.		
		§126-25-11. Student Rights.		
7/5/02	Betty J. Maxwell School Nurse P. O. Box 218 Lost Creek, WV 26385	Refer to 126-25-9 - Students are entitled to the assignment of medication administration by qualified personnel such as teachers.		
7/6/02	Jane Ishman School Nurse Berkeley County Schools 4933 Engle Moler Road Shepherdstown, WV 25443	It's the school nurses responsibility to keep the student safe and have qualified and trustworthy non-professionals administering or performing specialized procedures.		
		§126-25-12. Penalties.		
7/5/02	Laura Skidmore Rhodes MSN, RN Executive Director WV Board of Examiners for Registered Professional Nurses 101 Dee Drive Charleston, WV 25311-1620	The following are comments relative to the procedure. Comments and recommendations in no way reflect the Board's support of the Policy. The Board shares the following: Language should be added which includes the potential for disciplinary action from the licensing agency.		
		§126-25-13. Administrative Due Process.		

Renee Hodges

From: Lenore Zedosky [lzedosky@access.k12.wv.us]
Sent: Friday, June 14, 2002 10:29 AM
To: Renee Hodges
Subject: FW: Medication Policy

For the Policy 2422.7 comment log

Executive Director,
Office of Healthy Schools
West Virginia Department of Education
1900 Kanawha Blvd. E.
Charleston, WV 25305
Phone: 304-558-8830
Fax: 304-558-3787



-----Original Message-----

From: Sue Peros [mailto:sueperos@citynet.net]
Sent: Friday, June 14, 2002 12:19 AM
To: Lenore Zedosky
Cc: Sue Peros
Subject: Medication Policy

Lenore:

Boone County Schools: Sue Peros, RN

After reviewing the policy on review re: Specialized Procedures, my comments:

This policy would address the new legislation on Medication Administration effectively. I appreciate how that it continues to provide for the school nurse to determine who and where the safest environment is, for such administration in the schools.

Thanks you,

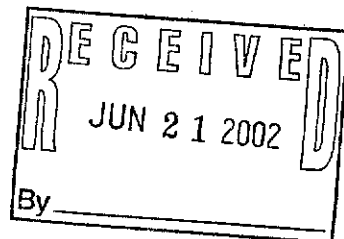
Sue Peros
School Nurse

Renee Hodges

From: Lenore Zedosky [lzedosky@access.k12.wv.us]
Sent: Monday, June 24, 2002 7:49 AM
To: Renee Hodges
Subject: FW: Comments on Policy 2422.7

Please add to comment log

Executive Director,
Office of Healthy Schools
West Virginia Department of Education
1900 Kanawha Blvd. E.
Charleston, WV 25305
Phone: 304-558-8830
Fax: 304-558-3787



-----Original Message-----

From: Mamabayer40@cs.com [mailto:Mamabayer40@cs.com]
Sent: Friday, June 21, 2002 8:16 AM
To: lzedosky@access.k12.wv.us
Subject: Comments on Policy 2422.7

Policy 2422.7 appears well written. Thank you for the opportunity to comment on this policy.

Teresa Bayer
Wood County School Nurse

Policy 2422.7
Standards for Basic and Specialized Health Care Procedures
Comment Response Form

Please use this form when commenting on proposed Policy 2422.7. You may attach additional sheets if necessary.

Individual/Organization: Janice Greene, RN KCS

Title: School Nurse

Street Address: 200 Elizabeth St City/State/Zip: Chas WV 25311

Comments/Suggestions

126-25-1. General

Does this policy include clerks?

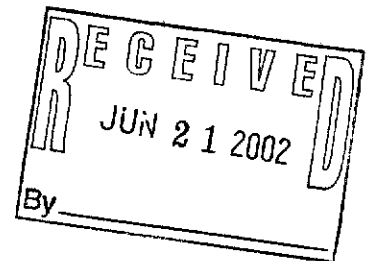
126-25-2. Purpose.

126-25-3. Definitions.

126-25-4. State Administrative Procedures.

126-25-5. Organization and Management.

126-25-6. System for School Admission and Care.



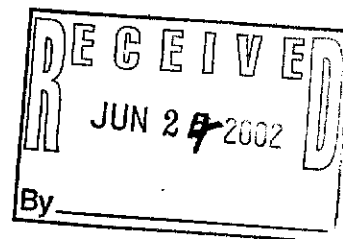
Policy 2422.7
Standards for Basic and Specialized Health Care Procedures
Comment Response Form

Please use this form when commenting on proposed Policy 2422.7. You may attach additional sheets if necessary.

Individual/Organization: Brenda C Isaac RN
Title: Lead School Nurse - Kanawha County Schools
Street Address: 200 Elizabeth St. City/State/Zip: Charleston, WV 25311

Comments/Suggestions

126-25-1. General



126-25-2. Purpose.

126-25-3. Definitions.

3.11 Given the explanation in the Executive Summary, properly trained secretaries can assist school nurses in medication administration. The responsibility for safety assurance, as always, remains with the certified school nurse.

126-25-4. State Administrative Procedures.

126-25-5. Organization and Management.

126-25-6. System for School Admission and Care.

Policy 2422.7
Standards for Basic and Specialized Health Care Procedures
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126-25-7. Health Care Plan.

126-25-8. Quality Assurance.

126-25-9. School Health Records.

126-25-10. Staffing Requirements.

126-25-11. Student Rights.

126-25-12. Penalties.

126-25-13. Administrative Due Process.

Return comments by July 7, 2002 to:

Lenore Zedosky
Executive Director
West Virginia Department of Education
Building 6, Room 309
1900 Kanawha Boulevard, East
Charleston, WV 25305-9969
E-mail: lzedosky@access.k12.wv.us
FAX: (304) 558-3787

Policy 2422.7
Standards for Basic and Specialized Health Care Procedures
Comment Response Form

Please use this form when commenting on proposed Policy 2422.7. You may attach additional sheets if necessary.

Individual/Organization: Betty J Maxwell

Title: School Nurse

Street Address: P.O. Box 218 Lost Creek, WV City/State/Zip 26385

Comments/Suggestions

126-25-1. General *Nineteen years of experience as a school nurse has convinced me that school secretaries are not the group of individuals that should be giving medications.*

126-25-2. Purpose. *Continuous interruptions make administration of medications without distractions next to impossible for secretaries. Having only one secretary in many schools, creates a problem when the secretary is absent.*

126-25-3. Definitions.

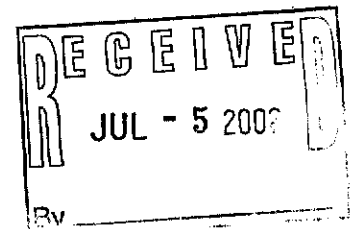
3.2 As a general rule secretaries do not have CPR certification.

3.11 →

126-25-4. State Administrative Procedures.

At the present time - secretaries are not trained to give medications. Time would have to be set aside to do this prior to this school year.

126-25-5. Organization and Management.



126-25-6. System for School Admission and Care.

126CSR25

- b. Follow due process procedure as outlined by the WV Board of Education.
- c. Appeal unacceptable outcomes at the third step to the State Superintendent of Schools.

126-25-3

- 3.11 Harrison County has up to the present time maintained that only teachers would be giving medications.
- 3.13 To create a minimum safe standard - secretaries time must be uninterrupted. Then a second person would need to be present to fill in for the secretary

Policy 2422.7
Standards for Basic and Specialized Health Care Procedures
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126-25-7. Health Care Plan.

126-25-8. Quality Assurance.

*A review of the most recent health needs assessment of WV students will reflect —
a. Increased numbers of complicated medications being given to students →*

126-25-9. School Health Records.

9.1 + 9.2 most secretaries' desks are open + in view of all who enter the school. ? Confidentiality ? Security ? Documentation

126-25-10. Staffing Requirements.

~~As~~ a general rule, secretaries prior to the present time, ^{and amended code} did not want to give medications. Most stated they felt inadequate →

126-25-11. Student Rights.

*Refer to 126-25-9
Students are entitled to the assignment of medication administration by qualified personnel such as teachers.*

126-25-12. Penalties.

126-25-13. Administrative Due Process.

Return comments by July 7, 2002 to:

Lenore Zedosky
Executive Director
West Virginia Department of Education
Building 6, Room 309
1900 Kanawha Boulevard, East
Charleston, WV 25305-9969
E-mail: lzedosky@access.k12.wv.us
FAX: (304) 558-3787

126-25-8

- b. Medications per inhaler + nebulizer are increasing dramatically.
- c. Medications are given by gastrostomy tubes.
- d. Many controlled drugs are now being given. Accountability will be a greater problem.
- e. Doctors are now ordering rectal administration of medications.
- f. Some medications take a few ^(to several) minutes to complete administration.
ie: (nebulizers) (tube feedings)

26-25-10

with giving medications + relieved to know they did not have to give them. Their work stations were constantly busy.

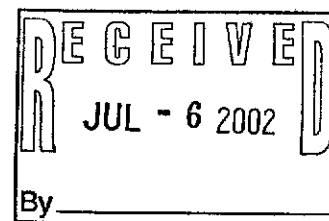
If a school has two secretaries + the least ~~senior~~ secretary is deemed most competent ^{by the school nurse} to give medications, a real uncomfortable work environment has been created.

A teacher that is with a student most of the school day can better assess a child's health state prior to and after medication is given. The teacher is in a better position to evaluate + refer a child if they see a change in the child's physical condition +/or behavior in the classroom.

In general terms - a secretary is with a student for a very short period of time - thus having very little time ^{if any} to observe ^{and evaluate} a child's general condition.

Renee Hodges

From: Lenore Zedosky [lzedosky@access.k12.wv.us]
Sent: Monday, July 08, 2002 10:27 AM
To: Renee Hodges
Subject: FW: Comment



Add to comment log

Executive Director,
Office of Healthy Schools
West Virginia Department of Education
1900 Kanawha Blvd. E.
Charleston, WV 25305
Phone: 304-558-8830
Fax: 304-558-3787

-----Original Message-----

From: teresa ryan [mailto:teresa_ryan72@yahoo.com]
Sent: Saturday, July 06, 2002 11:53 PM
To: Lenore Zedosky
Subject: Comment

Policy 2422.7

**Standards for Basic and Specialized Health Care Procedures
Comment Response Form**

Please use this form when commenting on proposed Policy 2422.7. You may attach additional sheets if necessary.

Individual/Organization: Teresa Ryan, RN Lincoln Co. Schools

Title: School Nurse

Street Address: City/State/Zip

10 Marland Ave., Hamlin WV 25523

Comments/Suggestions

126-25-1. General.

Although, as always, the school nurse retains the right and ability to decide whether or not a person is capable of performing a specialized health care procedure safely, it was rather high-handed of the those who introduced this piece of legislation to allow secretaries to administer medication after the Council of School Nurses and the Board of Examiners for Professional Nurses had studied the issue and determined it generally unsafe. We are professional nurses and face the problem of medication administration everyday. We are spread very thin and need more help; if we had thought this was a good solution we would have embraced the idea. The person(s) responsible deserves credit for the sneaky way it passed though, no one would vote against the bill since it contained our pay raises. And the fact that it was a "sneak attack" is evident by the fact that the language stated that secretaries would be allowed to "dispense" medications--a term reserved for pharmacists and physicians. My fear is that some administrators will not follow guidelines and allow secretaries to continue in their other duties while also administering medications, school nurses are not always there to make sure things are done the way we know they should. Secretaries are very busy and often have more placed on them than they really have time to do. If a secretary in this situation is also supposed to be administering medications, it is easy to see how they could be placed in a situation that would lend itself to a mistake during medication administration--and a school nurse will be held responsible.

126-25-2. Purpose.

126-25-3. Definitions.

126-25-8. Quality Assurance.

126-25-9. School Health Records.

126-25-10. Staffing Requirements.

Current staffing is inadequate. 10.1.1 states that "school nurses must be employed in sufficient numbers..." To be adequately staffed, the school nurse to student ratio needs to be at least 1:1000 and include pre-k through 12th grade. It is absurd not to include senior high school students in the ratio; they do not suddenly stop needing school nurse services because they reach a certain age. Also, with increasing numbers of children with special needs and pre-school aged children, we need more help.

126-25-11. Student Rights.

Policy 2422.7
Standards for Basic and Specialized Health Care Procedures
Comment Response Form

Please use this form when commenting on proposed Policy 2422.7. You may attach additional sheets if necessary.

Individual/Organization: Jane Brown, Berkeley Co. Schools

Title: school nurse

Street Address: 4933 Engelwood Rd City/State/Zip: Shpherdstown WV 25443

Comments/Suggestions

126-25-1. General

126-25-2. Purpose.

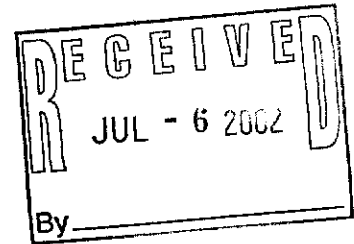
126-25-3. Definitions.

126-25-4. State Administrative Procedures.

126-25-5. Organization and Management.

126-25-6. System for School Admission and Care.

3.31. Change state form?



Policy 2422.7
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126-25-7. Health Care Plan.

126-25-8. Quality Assurance.

126-25-9. School Health Records.

126-25-10. Staffing Requirements.

*State the school nurse has final say
if person selected by W. BOE or locally admin if someone
is to be trained in a specialized procedure. The nurse
cannot be coerced or sed someone must be trained, when*

126-25-11. Student Rights)

*there is concern or evidence this is not a
safe situation for the student.
It's the school nurse's responsibility to keep the student
safe & have qualified & trustworthy non-professionals
administering or performing specialized procedures.*

126-25-12. Penalties.

126-25-13. Administrative Due Process.

Return comments by July 7, 2002 to:

Lenore Zedosky
Executive Director
West Virginia Department of Education
Building 6, Room 309
1900 Kanawha Boulevard, East
Charleston, WV 25305-9969
E-mail: lzedosky@access.k12.wv.us
FAX: (304) 558-3787

Laura S. Rhodes, M.S.N., R.N.
Executive Director

email:westvirginiarn@ncsbn.org
web address:www.state.wv.us/nurses/rn



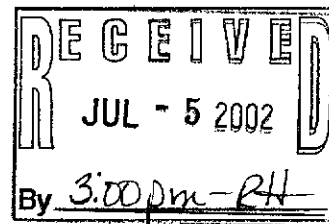
TELEPHONE:
(304) 558-3596
(304) 558-3728
FAX (304) 558-3666

**STATE OF WEST VIRGINIA
BOARD OF EXAMINERS FOR REGISTERED PROFESSIONAL NURSES**

**101 Dee Drive
Charleston, WV 25311-1620**

July 5, 2002

Lenore Zedosky, Program Director
Healthy Schools
Department of Education
Building 6, Room 358
1900 Kanawha Blvd., East
Charleston, WV 25303-5305



Dear Ms. Zedosky:

The West Virginia Board of Examiners is taking this opportunity to respond to the draft of Policy 2422.7 - Standards for Basic and Specialized Health Care Procedures which is being written for the implementation of permitting school secretaries to administer medication to students. As you may recall, you and representatives of school nurses in West Virginia met with the Board in August 2001 to discuss the plan to permit school secretaries to administer medication. During this meeting you indicated to the Board that the planned legislation would not be submitted during the 2002 Legislative Session. Subsequent to the August 2001 meeting a letter was sent to you indicating the Board's strong opposition to this plan. This is mentioned in the "Background" Section of the Executive Summary attached to the Policy.

Sometime after the March 2002 meeting of the Board and after the 2002 Legislative Session you phoned the Board office to relay the information that the law to permit secretaries to administer medication was passed. You indicated you were not aware of this occurring until the day you called the Board office and it was a last minute change to another bill.

During the June 2002 meeting you indicated that you did receive information which indicated a change would be made during the 2002 Legislative Session. Unfortunately, this information was not shared with the Board.

The Board remains opposed to this change. The "Purpose" section of the Executive Summary indicates that "because the law has changed". The reading of the law lends one to determine that there is still a choice. The individual has a choice to participate and this would seem, then, that the school has a choice to implement. The language does not mandate all school secretaries to participate in medication administration.

The "Impact" section of the Executive Summary is particularly offensive to the Board. The indication is that the nursing shortage is the driving force behind this change. The driving force is **failure to fund positions to hire school nurses**. The Board is sure that if there were a shortage of teachers and principals, changing the job category of secretaries to facilitate teaching and administration would not occur. The implication is that all the individual would need to do would be to make sure school happens. We all know there is more to the skill of teaching and administering a school than just making sure everyone shows up. Educational and societal norms and expectations, and, common sense dictate that a certain level of educational preparation is required to gain jobs which place a person in the position of teaching our country's most valuable asset, our children.

The same is true for the health care of our children in our schools. Attendance policies which encourage or force principals and school administration to think that the administration of medication is acceptable to keep a child in school in order to maintain a certain performance rating is a pathetic example for our children. Medications should be used to maintain a healthful lifestyle for the individual. A child with a headache may only need a glass of water, not a Tylenol. Or, they may need a trip to the local hospital emergency department. Our children do not need to learn that each ache and pain can or needs to be "fixed" with a medication. Our children do need to learn that medication, properly prescribed and administered, can help them maintain or re-gain a healthful state.

Since the first laws and rules related to school nurses were written many issues related to health care needs of children in the school setting have changed. The population of children with health care needs has increased significantly over the years. There are more children on medication, requiring one to one nursing care, and requiring skilled care.

Administering medication is more than placing a pill in the hand or mouth of an individual and providing a medium for swallowing it. Making sure the medication is correct, needed, for the right person, the right time, the right purpose; all of these are part of the process. Evaluating whether a student needs a medication and monitoring the child for adverse effects are even more important aspects of medication administration. The potential for harm is great for a task that may seem so simple.

The Board is very much opposed to the change to include secretaries particularly in light of the fact that this was known and is still known to the Department of Healthy Schools. At its June Board meeting the board discussed several options related to this matter. These included seeking legal remedies to determine if the Department of Education has exceeded its legislative authority; pursuing inappropriate delegation action against individual nurses, and reporting secretaries to the prosecuting attorney for practicing nursing without a nursing license. These options are currently being reviewed by this agency.

As stated before, the Board is opposed to this change. Because the law provides for it to occur doesn't mean it is a requirement. It appears that the law allows for decision making by the individual and the school. The Board encourages to both deny the implementation of this procedure and related practice.

The Board also strongly encourages the Department of Healthy Schools to talk with the Office of Health Facility Licensure and Certification (304-558-0050) regarding the program for medication administration by unlicensed assistive personnel in certain settings, and to some of the nurses who are part of this process. Under these guidelines the nurse at least has the authority to decide who is competent and who is not and can change that status anytime the nurse believes the situation has changed.

The following are comments relative to the procedure. Comments and recommendations in no way reflect the Board's support of the Policy. The Board shares the following:

Organization and Management:	No Comment
System for School Admission and Care:	§126-25-6.1.1."Physician's orders" should be changed to "orders from the health care provider". This language will include orders from Nurse Practitioners, Dentists and other licensed health care providers with such authority.
Health Care Plan:	The health care provider language needs to be changed as indicated in the previous section.
Quality Assurance:	No comment.
School Health Records:	No comment.
Staffing Requirements:	Staffing should be improved. Money should be allocated to provide for the hiring of an adequate number of schools nurses.
Student Rights:	No comment.
Penalties:	Language should be added which includes the potential for disciplinary action from the licensing agency.

Page 4

Comments for Policy 2422.7

Administrative Due Process:

No comment.

You will be kept informed of any action the Board may take as they pursue the various options discussed. Should you have any questions or require further information please contact me at this office.

For the Board,

A handwritten signature in cursive script that reads "Laura Skidmore Rhodes".

Laura Skidmore Rhodes, MSN, RN
Executive Director

xc: Board, file