



Massachusetts
School Nurse Organization, Inc.

July 29, 2022

Senator Cindy Friedman
Senator Michael Rodrigues
State House
24 Beacon Street
Boston, MA 02133

Dear Senate Chairs Rodrigues and Friedman and members of the Senate Ways and Means Committee,

We are writing on behalf of the Massachusetts School Nurse Organization (MSNO) regarding our concerns with **H. 5052, An Act providing for diabetes management in schools**. We would like to outline here the regulations and safeguards already in place across the Commonwealth, those that guide our school nurses in their support of the health and safety of our students with diabetes in the school setting. MSNO has concerns with language in this bill, which references who, within a school district, would administer an “insulin delivery system” to a student with diabetes. School nurses have the expertise in advanced physical assessment, a skill essential in determining both the need for and/or the correct calculation of insulin (dosage) as compared to “other school personnel or a responsible adult.” .

In addition, not once in this bill is there language which delineates specifically what type of “training” would be provided to these “other school personnel or a responsible adult” under the guise of the Department of Elementary and Secondary Education (DESE) and the Department of Public Health (DPH). There is also no language in the bill referencing the said cost of such an extensive and lengthy training, as this would require - certainly a major concern relative to a potential future cost burden to our schools. I would also like to refer here to our state regulation **105 CMR 210.004(B)(4)** which reads: *“The administration of parenteral medication may not be delegated, with the exception of Epinephrine administered in accordance with 105 CMR 210.100.”* It is our inherent belief that amending MGL 71:54B would greatly compromise the role, responsibility and professional judgement of the nurse in the educational setting, not to mention jeopardizing optimal student health and safety.

MSNO promotes and advances the health, well being and safety of school age children across the Commonwealth. We appreciate your thoughtful consideration of our concerns relative to this bill.

Sincerely,

The Massachusetts School Nurse Organization, Executive Committee