



July 29, 2022

His Excellency Charles D. Baker  
Governor of the Commonwealth of Massachusetts  
State House, RM 280  
Boston, MA 02133

Dear Governor Baker:

On behalf of the over 25,000 nurses and healthcare professionals represented by the Massachusetts Nurses Association and the Massachusetts School Nurses Organization, we write to express our concerns with ***House Bill 5052- An Act Providing for Diabetes Management in Schools*** which was passed recently by the legislature. We ask that you veto this legislation to prevent it from becoming law due to a myriad of safety concerns outlined below.

We oppose this legislation for the following reasons:

- Type 1 diabetes is rising and affecting younger and younger students.
- Managing it is very complex, requiring professional clinical skills to calculate the carbohydrate intake, insulin requirements, impact of exercise, “sick day” modifications, etc.
- These are the skills of a clinical professional, i.e., the school nurse, working with the endocrinology provider.

If it became law, this legislation would permit unlicensed school personnel to administer insulin and glucose monitoring tests. In the case of a student who is unable to self-administer a glucose monitoring test or insulin delivery system, the modified language allows unlicensed personnel to manage the testing or the insulin delivery system. We have been on the record in the past as opposing glucagon administration- but this is far worse. Presumably these would be teachers and school administrators giving insulin—all lacking the complex skills to manage diabetes safely:

- The symptoms of high and low blood sugar levels in some children are similar; this law would require a school staff member, who is untrained in assessment, to clinically assess the child for an abnormal glucose level or a myriad of other concerns that the non-medical school personnel are not trained or licensed to assess. In addition, the child may be having a seizure for another reason, e.g., seizure disorder, choking, etc. Again, this requires an assessment provided by a trained healthcare professional.
- Insulin given for the wrong reason or in the wrong dose can cause significant patient harm. Too much insulin can lead to significant neurological sequelae and death. The Institute for Safe Medications (ISMP) has identified insulin as a high risk medication, a

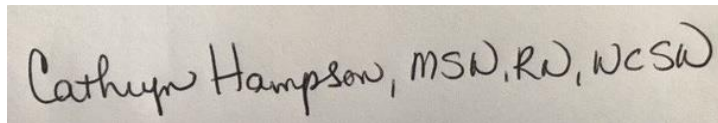
class that includes medications that present a heightened risk of significant patient harm when used in error

(citation: <https://www.ismp.org/sites/default/files/attachments/2018-08/highAlert2018-Acute-Final.pdf>)

- Hospitals would never have their secretaries and administrators administer insulin, so why is it acceptable in a school setting?

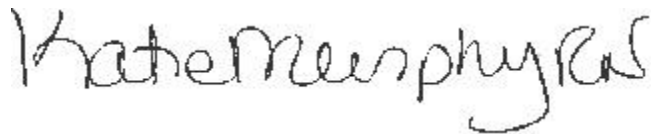
Managing diabetes requires the knowledge and skill of a professional school nurse. Whenever a child with diabetes attends school, a full-time professional school nurse is required. This proposal is inherently risky and unfair to both the student and the unlicensed school staff who have other duties.

Sincerely,

A photograph of a handwritten signature in black ink on a light-colored background. The signature reads "Cathryn Hampson, MSN, RN, NCSN".

Cathryn Hampson, MSN, RN, NCSN

President, Massachusetts School Nurses Organization

A photograph of a handwritten signature in black ink on a light-colored background. The signature reads "Katie Murphy, RN".

Katie Murphy, RN

President, Massachusetts Nurses Association

cc: Secretary Marylou Sudders