Emergency Epinephrine and EAI (EAs) in the School Setting FAQs. 9/21/2017

Administration

Can a school medical director order a second dose of epinephrine in their non-patient specific standing order? Yes, they may include this in the non-patient specific standing order for school nursing personnel who are RNs.

Can trained school personnel give a second dose of EAI if the student's symptoms do not improve and the plan instructs them to do so? Yes, they should follow the emergency care plan as written for students with patient specific orders, or school protocol when trained in accordance with PHL 3000c. EMS should be called when the first dose is administered.

May an LPN administer emergency epinephrine under a non-patient specific order from the medical director? No – an LPN may administer emergency epinephrine under a patient specific order or as directed by an RN or the medical director.

May the school’s stock auto-injector be used if the parent has not provided the student’s EAI medication, or the student’s personal EAI is not available? Yes

Must students provide 2 EAs? There is no requirement for a student’s parent/guardian to provide a second EAI to the school unless the provider order requires a second dose.

What is required for a student to be considered Independent and self-carry and administer their own EAI? Provider and parent written permission is necessary. The written permission shall include an attestation by the physician or the health care provider confirming the following: (a) the pupil's diagnosis of an allergy for which an EAI is needed; and (b) that the pupil has demonstrated that he or she can self-administer the prescribed EAI effectively. (Resource: See Option Chart)

What should a school nurse do if she receives a patient specific order for EAI, but the parent does not supply the medication? The nurse should consult with the district medical director. They may recommend contacting the parent and provider to inform them that as of that date no medication has been provided to the school in accordance with school medication policies. Parents should be reminded that in order to develop an emergency care plan tailored to their child’s needs; the school will need both parent and provider written permission and the EAI.

Branded vs Generic EAI

May a branded medication be substituted for another branded medication or generic if they are the same drug and dosage? Yes, a brand name could be substituted for a generic EAI if the dose is the same.

Liability

Does the Good Samaritan Act cover non-nursing school staff that provides emergency care at school? Yes, PHL 3000a Emergency Medical Treatment
**Monitoring and Record Keeping**

*How often do we need to check the EAI to make sure it is secure and that it is usable?*  
Once a day is advisable. This is up to the medical director in conjunction with the board of education or building administrator and should be noted in the school policy.

*Is there a sample form we can use to document that the EAI is secure and ready for use?* Yes, NYSCSH has created sample forms you may modify as needed for recording both placement and monitoring of the EAI (and AED).

**Notification/Reporting**

*How can the AED cabinet be modified to allow a breakaway lock?* A hole may be drilled in the cabinet frame and door to allow the breakaway lock to pass through both surfaces and secured to the door. Alternatively a bracket may be affixed to the cabinet allowing the breakaway lock to pass through that and the cabinet door handle, securing the unit.

*How do we document where the EAI units are located and the type, dose, and expiration date of the units?* NYSCSH created a sample recording document which may be modified as needed by school districts to document this data.

*Is it required that districts notify the school community that a non-patient specific epinephrine is in place and the details of the school response?* No, although the law does not require this, it is best practice and allows for better communication within the school community.

*What information might I share with parents who have a student with a diagnosed allergy required EAI?* In order to provide emergency care specific to each student, the parent must provide orders and the prescribed medication to the school. The medication form should inform parents that they are expected to provide the EAI. Follow-up phone calls to parents of students with severe allergies who have not provided the EAI should reiterate the necessity of providing the medication. Sample medication forms and letters are available on the NYSCSH website.

*Who may dispense/provide EAI's?* A health care practitioner who is authorized to prescribe drugs, or a pharmacist with a non-patient specific prescription may dispense or provide an EAI device to or for an eligible person or entity.

*Where can the district purchase breakaway locks?* Search the internet for terms “Break-Away”, “Tamper Resistant” locks. The lock must be able to be easily broken by hand to ensure the EAI is readily accessible if needed.

*Who must be notified when EAI is administered?* All administrations of epinephrine require immediate follow up care in an emergency room, and notification of the student’s parent/guardian, or the staff member’s emergency contact. Additionally, it is highly recommended that the medical director is notified. While not required, NYSCSH provides a voluntary reporting form which allows the NYSCSH/SED to collect data on EIA outcomes. This information provides data for the school nurse and emergency management team.
Patient Specific Verses Non-Patient Specific EAI Orders (See Chart)

Can an RN (school nurse) administer epinephrine to students, staff members, or others using a non-patient specific order from the Medical Director at school and any school sponsored event? Yes.

Can the personnel trained to administer to a particular student with a patient specific order administer the EAI at school and at any school sponsored event? Yes – See also heading Unlicensed personnel.

Requirements to Implement Non-Patient Specific EAI Administration by Staff

What requirements are needed to implement an EAI program for volunteer unlicensed staff? NYSDOH training, post-test, checklist (available here), and district policy. It is strongly recommended when administered to notify school medical director or ordering prescriber of, document in student’s cumulative health record, and to continue to store and track stock EAI in the same manner.

Stock EAs (EAs)

May the non-patient specific stock EAI for RN use be used as the stock for trained unlicensed staff to administer? Yes. The non-patient specific stock epinephrine for RN use may be stored where trained staff are able access it in a timely manner. This should be addressed in district policy and guidance.

May the school’s stock auto-injector be used if the parent has not provided the student’s EAI medication, or the student’s personal EAI is not available? Yes, if the student has a patient specific order, but parents have not provided the school with the individual student’s medication or the medication is not immediately available- nurses or trained school personnel may administer epinephrine/EAI in an emergency (at same dose as on provider order) from the school’s stock supply.

Storage

How does the EAI need to be stored? The EAI must be stored in a secure location which is accessible in an emergency. They may be placed in the school’s AED cabinet or storage cabinet with a break-away lock to ensure integrity, or a first aid kit in the Main Office or Athletics area. The remaining stock of EAs should be stored in a locked cabinet in the school’s health office. Trained school personnel must be informed of where EAs are stored in the event they need to administer.

Training

Can bus drivers administer EAI to a student with an order? Unlicensed persons, including bus drivers, may be trained by a school nurse to administer EAs to student with orders. The bus driver will need a copy of the emergency care plan and know the location of the EAI. This should be noted in the student’s ECP.
Can a LPN be trained to administer an EAI to anyone experiencing anaphylaxis without RN direction? Yes. An LPN may administer an EAI if the LPN takes the approved NYSDOH course, completes the test, and is approved by the designated trainer.

Does the school nurse need to take the NYSDOH/NYSED training to administer epinephrine under the non-patient specific order from the medical director? No. Nurses scope of practice permits administration of medications in accordance with a provider order under their professional license. For an LPN the directing practitioner should assess that the LPN can administer an injection, and has had training on anaphylaxis. All nurses are to keep their knowledge base up to date, and are encouraged to review the training periodically.

What training is required for unlicensed personnel to administer a non-patient specific order EAI on site to any student or staff member who appears to be suffering anaphylaxis, regardless of history? Unlicensed personnel must be trained annually using a course approved by the NYSDOH under PHL 3000c. This training is available on the NYSCSH website.

Who trains unlicensed personnel to administer EAI to a student with a patient specific order? Education Law §921 requires that such unlicensed personnel are trained by an RN, NP, PA, or physician to administer an EAI to a student with a patient specific order. This training must be completed annually. Using the NYSDOH approved training is recommended but not required and is available on the NYSCSH website.

Who trains unlicensed personnel to administer EAI to a student or staff under PHL 3000c (Administration of EAI for those that do not have a patient specific order)?

1. If school staff receive training from a nationally approved training course, the trainer certified to teach the content from that national course would complete the school staff training. They may supplement the training with the NYSDOH training content.

2. If the training used is the NYSDOH approved training program Managing Allergies & Anaphylaxis at School; Training for School Personnel, found on the NYSCSH website, the trainer must be a licensed professional (ie. Registered Nurse or Physician).

Unlicensed Personnel

Can unlicensed personnel who are trained in accordance with PHL 3000c administer non-patient specific EAI to students or staff outside the instructional facility (school building)? No, Education Law limits unlicensed personnel trained in accordance with PHL 3000c to administering EAI in a school building.

What requirements are needed to implement an EAI program for volunteer unlicensed staff? NYSDOH training, post-test, checklist (available here), and district policy. It is strongly recommended when administered to notify school medical director or ordering prescriber of, document in student’s cumulative health record, and to continue to store and track stock EAI in the same manner.