



## Process and Protocols for Delegation and Medication Administration


 Northeastern University School Health Academy in collaboration  
with the Vermont Department of Health. 2022

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## Disclosures



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**Presenter**



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**Co-Director of the Northeastern University**  
**School Health Academy**

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**Learning Outcomes**

**After viewing the presentation, the learner will be able to:**

- **Recognize the Vermont Nurse Practice Act (NPA)**
- **Apply the principles of the NPA to school nursing practice**
- **Describe the protocols for medication administration**
- **Identify the process for delegation**

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## Framework for 21<sup>st</sup> Century School Nursing Practice™

NASN's *Framework for 21st Century School Nursing Practice* (the *Framework*) provides structure and focus for the key principles and components of current day, evidence-based school nursing practice. It is aligned with the Whole School, Whole Community, Whole Child model that calls for a collaborative approach to learning and health (ASCD & CDC, 2014). Central to the *Framework* is student-centered nursing care that occurs within the context of the students' family and school community. Surrounding the students, family, and school community are the non-hierarchical, overlapping key principles of *Care Coordination*, *Leadership*, *Quality Improvement*, and *Community/Public Health*. These principles are surrounded by the fifth principle, *Standards of Practice*, which is foundational for evidence-based, clinically competent, quality care. School nurses daily use the skills outlined in the practice components of each principle to help students be healthy, safe, and ready to learn.

 <p><b>Standards of Practice</b></p> <ul style="list-style-type: none"> <li>• Clinical Competence</li> <li>• Clinical Guidelines</li> <li>• Code of Ethics</li> <li>• Critical Thinking</li> <li>• Evidence-based Practice</li> <li>• NASN Position Statements</li> <li>• Nurse Practice Acts</li> <li>• Scope and Standards of Practice</li> </ul>	 <p><b>Care Coordination</b></p> <ul style="list-style-type: none"> <li>• Case Management</li> <li>• Chronic Disease Management</li> <li>• Collaborative Communication</li> <li>• Direct Care</li> <li>• Education</li> <li>• Interdisciplinary Teams</li> <li>• Motivational Interviewing/Counseling</li> <li>• <b>Nursing Delegation</b></li> <li>• Student Care Plans</li> <li>• Student-centered Care</li> <li>• Student Self-empowerment</li> <li>• Transition Planning</li> </ul>	 <p><b>Leadership</b></p> <ul style="list-style-type: none"> <li>• Advocacy</li> <li>• Change Agents</li> <li>• Education Reform</li> <li>• Funding and Reimbursement</li> <li>• Healthcare Reform</li> <li>• Lifelong Learner</li> <li>• Models of Practice</li> <li>• Technology</li> <li>• Policy Development and Implementation</li> <li>• Professionalism</li> <li>• Systems-level Leadership</li> </ul>	 <p><b>Quality Improvement</b></p> <ul style="list-style-type: none"> <li>• Continuous Quality Improvement</li> <li>• Documentation/Data Collection</li> <li>• Evaluation</li> <li>• Meaningful Health/Academic Outcomes</li> <li>• Performance Appraisal</li> <li>• Research</li> <li>• Uniform Data Set</li> </ul>	 <p><b>Community/Public Health</b></p> <ul style="list-style-type: none"> <li>• Access to Care</li> <li>• Cultural Competency</li> <li>• Disease Prevention</li> <li>• Environmental Health</li> <li>• Health Education</li> <li>• Health Equity</li> <li>• Healthy People 2020</li> <li>• Health Promotion</li> <li>• Outreach</li> <li>• Population-based Care</li> <li>• Risk Reduction</li> <li>• Screenings/Referral/Follow-up</li> <li>• Social Determinants of Health</li> <li>• Surveillance</li> </ul>
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ASCD & CDC. (2014). *Whole school whole community whole child: A collaborative approach to learning and health*. Retrieved from <http://www.ascd.org/ASCD/pdf/siteASCD/publications/wholechild/wsc-a-collaborative-approach.pdf>

© National Association of School Nurses, 2015 BETTER HEALTH. BETTER LEARNING.™ Rev. 10/6/18

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## Vermont Nurse Practice Act

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<https://legislature.vermont.gov/statutes/section/26/028/01572>

**You can always contact  
the Board of Nursing for specific questions  
regarding RN license**

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## Registered Nurse

"Registered nursing" means the practice of nursing, which includes:

- (A) Assessing the health status of individuals and groups.
- (B) Establishing a nursing diagnosis.
- (C) Establishing goals to meet identified healthcare needs.
- (D) Planning a strategy for medical or health care.
- (E) Prescribing nursing interventions to implement the strategy of care.
- (F) Implementing the strategy of care.
- (G) Delegating nursing interventions that may be performed by others and that do not conflict with this subchapter.
- (H) Maintaining safe and effective nursing care rendered directly or indirectly.
- (I) Evaluating responses to interventions.
- (J) Teaching the theory and practice of nursing.
- (K) Managing and supervising the practice of nursing.
- (L) Collaborating with other health professionals in the management of health care.
- (M) Addressing patient pain.
- (N) Performance of such additional acts requiring education and training and that are recognized jointly by the medical and nursing professions as proper to be performed by registered nurses.

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## LPN

"Licensed practical nursing" means a directed scope of nursing practice that includes:

- (A) contributing to the assessment of the health status of individuals and groups;
- (B) participating in the development and modification of the strategy of care;
- (C) implementing the appropriate aspects of the strategy of care as defined by the Board;
- (D) maintaining safe and effective nursing care rendered directly or indirectly;
- (E) participating in the evaluation of responses to interventions;
- (F) delegating nursing interventions that may be performed by others and that do not conflict with this chapter; and
- (G) functioning at the direction of a registered nurse, advanced practice registered nurse, licensed physician, or licensed dentist in the performance of activities delegated by that healthcare professional

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## Delegation

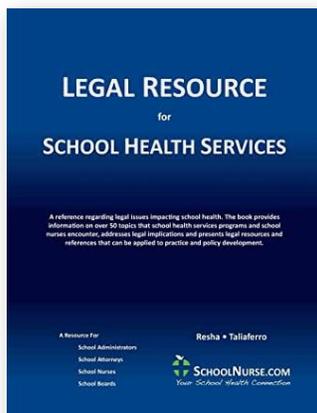
### Section 9 of the Vermont Health Services Manual

**Delegation-** The transfer of responsibility for the performance of an activity to another, with the former retaining accountability for the outcome. Delegation allows a delegatee to perform a specific nursing activity, skill, or procedure that is beyond the delegatee's traditional role and not routinely performed. In schools, delegation occurs when the SN/ASN assigns the performance of a specific nursing task to another person, often a LPN or AP.

NASN Position Statement on Delegation..... NASN supports school nursing delegation of appropriate nursing tasks to UAPs as permitted by state laws and regulations to meet student health and safety needs. School nurses implement NASN's *Framework for 21st Century School Nursing Practice™* principle of care coordination through direct and delegated care of students with healthcare needs (NASN, 2016). The decision to delegate is a serious responsibility that the school nurse determines on a case-by-case basis, based on the needs and condition of the student, stability, and acuity of the student's condition, potential for harm, complexity of the task, and predictability of the outcome (ANA, 2012).

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### LEGAL RESOURCE for SCHOOL HEALTH SERVICES

by Cheryl Ann Resha, Vicki L. Taliaferro, et al. | Aug 11, 2017

### Chapter 4 on Process for Delegation in the School Setting

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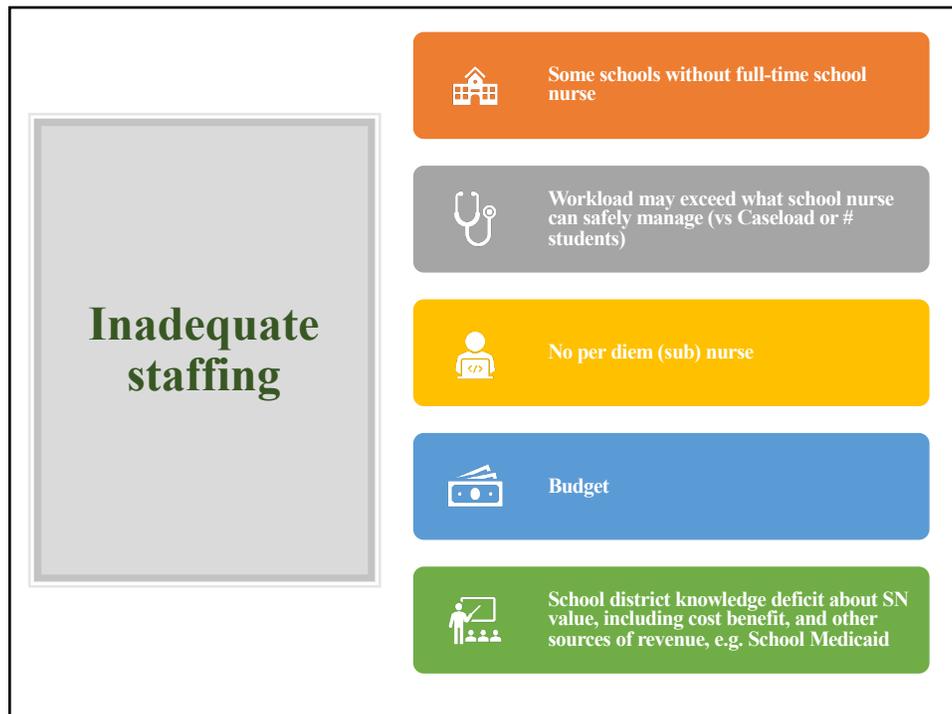
## Why delegation?

“Due to dilemmas posed by inadequate staffing of school nurse and federal mandates to care for an ever-increasing proportion of students with special health care needs, school nurses are frequently responsible and accountable for directing non-nursing school personnel, or unlicensed assistive personnel (UAPs), to perform health care tasks for which they would not typically be responsible (outside of caring for family members).”

Shannon & Kubelka (2013). Reducing the Risk of Delegation, part 1. NASN School Nurse, 180.

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## Delegation

**You cannot delegate nursing assessment or critical nursing judgment!**

Refer to:

1. your State Laws & Nurse Practice Acts to know under what circumstances delegation is permitted (if specified)
2. 2019 NASN Position Statement on Nursing Delegation in the School Setting <https://www.nasn.org/advocacy/professional-practice-documents/position-statements/ps-delegation>
3. 2019 National Standards for Nursing Delegation (NCSBN & ANA) [https://www.ncsbn.org/NGND-PosPaper\\_06.pdf](https://www.ncsbn.org/NGND-PosPaper_06.pdf)

You may be able to delegate tasks to UAPs (APs) under certain circumstances. .

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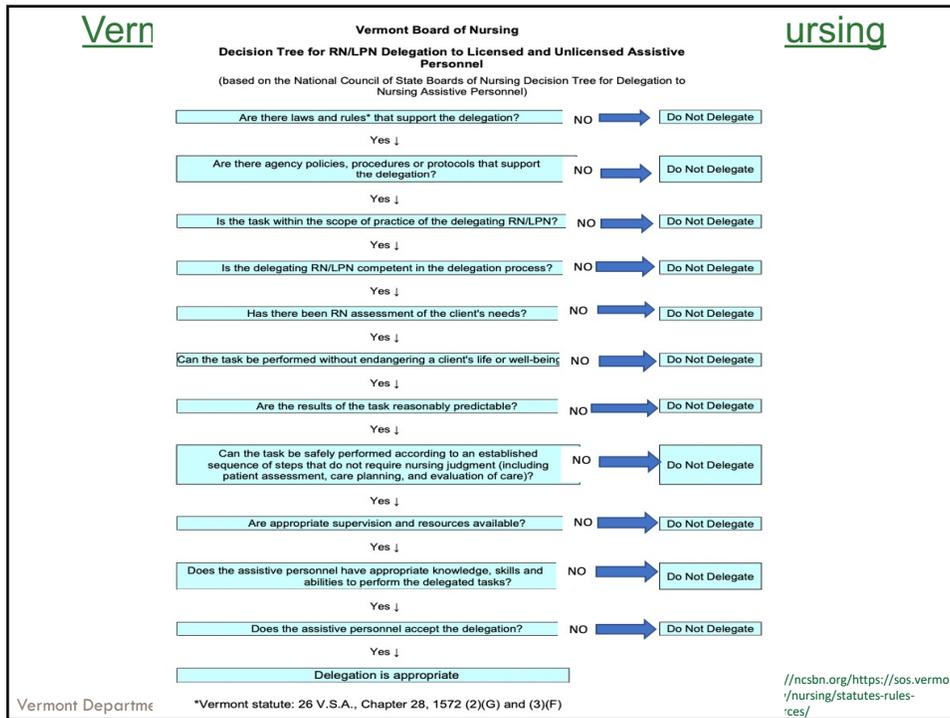
## Delegation - 5 rights

- Task
- Circumstance
- Person
- Directions
- Supervision and Evaluation

**Must be Documented**

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## Delegation - Support safety & success

- Know your state NPA & state/federal laws
- Follow 5 rights of Delegation
- Communicate with families, administrators, education team, potential delegates (UAPs).
- Develop policies and protocols
  - ▣ Define terms
  - ▣ Include references: state law and regulations, nurse practice act, professional standards
  - ▣ Use a decision tree/flow chart
- Develop IHPs, ECPs
- Evaluate language in 504/IEP
- Use procedure skills checklists for training and evaluation
- Train using teach-back/return demonstrate methods
- **Document...Document....Document**

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## Delegation – Checklists reduce risk by:

- “demonstrating accountability and competence of both school nurses and unlicensed assistive personnel (UAPs)
- reflecting the student’s specific health care needs while simultaneously promoting reliable and uniform execution of skills by different staff members
- providing an outline of step-by step actions for reference and reinforcement of proper techniques
- documenting the school nurse has demonstrated the procedure and that delegated personnel can correctly return demonstration
- documenting that the UAP accepts responsibility for assuming the task
- providing a regular documentation schedule for monitoring, evaluation, reinforcement, and remediation of UAP skills.”

Shannon & Kubelka (2013). Reducing the Risk of Delegation, part 2. NASN School Nurse, 222, 224.

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## Delegation

“ . . .the term *assignment* is used to describe nurse and non-nurse administrators’ general task transfer to school staff. The term *delegation* is used to describe RN transfer of nursing tasks to a UAP. Non-nurse administrators, such as a principal can identify and designate the staff member to be a delegatee. The delegatee must agree to accept the responsibility for the delegated tasks. It is important that school administrators understand that only the nursing profession, via state nurse practice acts, defines the scope of nursing practice, and that only RNs can delegate nursing tasks.

Delegation requires nursing judgment, and therefore lay administrators who delegate nursing tasks to a UAP might be considered by courts and state boards of nursing to be practicing nursing without a license (*Mitts v. Hillsboro Union High School District, 1987*). Consequently, non-nurse administrators should restrict their assignments to those duties outside the realm of nursing practice.”

Combe & Clark (2019). Management of School Health Staff. In Selekmán, Shannon, Younkaitis, Eds. School Nursing A Comprehensive Text, p. 946

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### *Mitts v. Hillsboro Union High School District, 1987*

The need to address the public's lack of understanding regarding delegation in school settings is essential for providing safe nursing care in schools. Delegation of nursing tasks by non-nurses, such as school administrators, can create litigious situations for both schools and school nurses. In *Mitts v. Hillsboro Union High School District, 1987*, the courts asked the Oregon Board of Nursing for a formal opinion on the delegation of intermittent catheterization of a student with spina bifida by a school principal to a school health assistant, despite the presence of a school nurse on staff. The Board found that (a) the school principal was practicing nursing without a license when he assumed responsibility for assessing, planning, and delegating healthcare for this student, and (b) that the health assistant was unlawfully practicing nursing by following the principal's assignment. The school nurse in this situation was disciplined for failing both to follow a standard of care and to conduct a nursing assessment on the appropriateness of delegation (Schwab & Gelfman, 2001). The need to address the public's lack of understanding regarding delegation in school settings is essential for providing safe nursing care in schools.

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**When is the LPN/LVN or UP responsible and accountable for an activity that is delegated to them by an RN?**

“While there is no argument that both delegation and assignment require supervision and assurance by the registered nurse that the task is completed correctly, the key difference is if the activity (i.e., assignment) is within their scope of practice for an LPN/LVN or routine responsibilities as a UP (NCSBN, 2016). If it is, then the person carrying out the activity is both responsible and accountable for the activity. For many school nurses, this distinction is important, particularly if they are not on-site for daily supervision and evaluation of the activity.”

Resha (2017). Process for Delegation in the School Setting. In Resha & Taliaferro, Eds, *Legal Resource for School Health Services*, SchoolNurse.com, p.40

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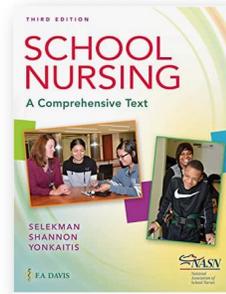
Delegating the nursing process or patient assessments to unlicensed people is not permitted.



*“No state permits school nurses to delegate the nursing process or patient assessments to unlicensed people*

*(NASN, 2014, 2017).”*

Brous (2019). The Law and School Nursing Practice. In Selekmán, Shannon, Younkaitis, Eds, School Nursing A Comprehensive Text. F.A.Davis, p.146.



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## Liability with Delegation

- If the delegating nurse followed all the acceptable practices of delegation (see delegation process section) and has documentation of those practices, the school nurse would not be responsible for the error.
- If, however, the school nurse did not conduct a comprehensive assessment, provide adequate training, supervision, evaluation, and documentation, both the school nurse and the delegatee would be responsible for the error (ANA, 2012; NCBSN, 2016).”

Resha (2017). Process for Delegation in the School Setting. In Resha & Taliaferro, Eds, Legal Resource for School Health Services, SchoolNurse.com, p.40

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## NASN position statements & resources

- **Delegation** <https://www.nasn.org/advocacy/professional-practice-documents/position-statements/ps-delegation> Resha (2017). Process for delegation in the school setting. In Resha & Taliaferro. Legal Resource for School Health Services. SchoolNurse.com, pp 35 - 48. Appendix. Decision Tree for Delegation by Registered Nurses, p. 48
- **Field Trips** <https://www.nasn.org/advocacy/professional-practice-documents/position-statements/ps-trips> Erwin & Clark (2017). School-Sponsored Field Trips. In Resha & Taliaferro. Legal Resource for School Health Services. SchoolNurse.com, pp 621 – 630.
- **Before, After, Extended School Year**  
<https://www.nasn.org/advocacy/professional-practice-documents/position-statements/ps-before-after-programs>  
 Clark (2017). School-Sponsored Before, After and Extended School Year Programs. In Resha & Taliaferro. Legal Resource for School Health Services. SchoolNurse.com, pp 597 – 601.

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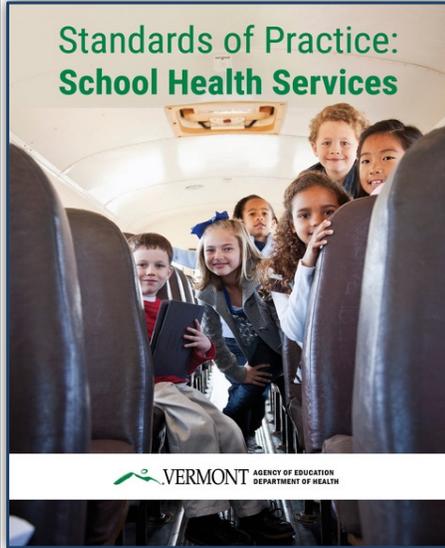
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## Where Do We Find the Vermont Standards of Practice for School Health Services?

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**Vermont Standards of Practice: School Health Services**



- Allergy Management
- Bloodborne Pathogens
- Child Abuse and Neglect
- Communicable Disease
- Drug, Alcohol and Tobacco Use
- Documentation
- Environmental Health
- Immunizations
- Licensing
- Liability
- Screening

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Where do we find information about Medication Administration?

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## Medication Administration



**Vermont Medication Training Guide for School Nurses:**  
A Tool for School Nurses to Train Others, 3/18/2019  
Vermont Department of Health  
Maternal and Child Health Division  
Healthvermont.gov



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- [22. Medications](#)
- [22. Medications: A\) Out of State Field Trips: Medication and Procedures](#)
- [22. Medications: B\) Field Trip Emergency Information and Medical Form](#)
- [22. Medications: C\) Medication Administration Training in the School Setting Form](#)
- [22. Medications: D\) Medication Incident Report](#)
- [22. Medications: E\) Medication Procedure](#)
- [22. Medications: F\) Verbal Medical Order Form](#)
- [22. Medications: G\) Comprehensive Alcohol, Tobacco and Other Drug Prevention](#)
- [22. Medications: J\) Naloxone Memo: Options for Accessing Naloxone](#)
- [22. Medications: J\) Sample Training for Vermont School Nurses - Naloxone](#)
- [22. Medications: K\) Sample Training of Naloxone Administration](#)
- [22. Medications: L\) Sample Core Competencies \(MA Department of Health\)](#)
- [22. Medications: M\) Sample non-prescription and prescription Forms](#)
- [22. Medications: N\) Medication Training Guide](#)

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## Administration Responsibilities

(Section 22 of the Vermont Standards of Practice: School Health Services)

- Only the school nurse/associate school nurse, the student's parent/guardian, or the school nurse's/associate school nurse's delegatee (Assistant Personnel [AP]) may administer medication in the school setting.
  - To assure the safe administration of medication in the school setting and on school field trips.
  - For prescription medication: secure written orders from the prescribing licensed provider detailing the name, dosage, route, frequency, diagnosis and reason for giving; written permission from the parent/guardian; and the medication must be in a container appropriately labeled by the prescribing licensed provider or pharmacy.

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## Vermont Board of Education

### School Nurse: Board of Education

#### (65) School Nurse

The holder is authorized to provide school health services in grades PK-12 and to collaborate with teachers and administrators to integrate health and wellness knowledge and skills throughout the school and curriculum.

[Vermont State Board of Education Rules Page 30 of 49 Series 5000 – Licensing of Educators. CVR 22-000-010](#)

### Vermont Agency of Education

#### REQUIRED SCHOOL NURSE/ASSOCIATE SCHOOL NURSE ROLES:

- All School nurses must have required AOE School Nurse/Associate School Nurse Licensure. This licensure (and renewal) is an online process.
- Develop a portfolio or folder for necessary documentation such as proof of required licensure and certification as well as personal learning and professional development activities.

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## Resources

- Brous (2019). The Law and School Nursing Practice. In Selekmán, Shannon, Younkaitis, Eds, School Nursing A Comprehensive Text. F.A.Davis, p.146.
- Vermont School Health Services Manual <https://www.healthvermont.gov/family/school/standards-practice-school-health-services-manual>
- NASN Position on Delegation <https://www.nasn.org/nasnold2022/advocacy/professional-practice-documents/position-statements/ps-delegation>
- National Association of School Nurses. (2019). *Nursing delegation in the school setting*. Retrieved from <https://www.nasn.org/nasn/advocacy/professional-practice-documents/position-statements/ps-delegation>
- National Council of State Boards of Nursing <https://ncsbn.org/decision-making-framework>
- Vermont Secretary of State <https://sos.vermont.gov/nursing/statutes-rules-resources/>
- Combe & Clark (2019). Management of School Health Staff. In Selekmán, Shannon, Younkaitis, Eds. School Nursing A Comprehensive Text, p. 946.
- [Vermont State Board of Education Rules Page 30 of 49 Series 5000 – Licensing of Educators. CVR 22-000-010](#)
- Resha (2017). Process for Delegation in the School Setting. In Resha & Taliaferro, Eds, Legal Resource for School Health Services, SchoolNurse.com, p.40

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