Dear Hellan,

CSNO is pleased to share processes for providing vaccine delivery in the educational setting. These steps are based upon Federal and State laws, Standards of Practice and Clean Technique practices. These steps amount to more than 15 minutes in time and while it may be perceived that medication delivery is simply “jabbing” a student, we beg to differ. Further, we would also like to point out in the LEA Medi-Cal Billing option program manual, it states the following:

**Treatment Services Nursing treatment services and school health aide treatment services Billed**

Using 15-Minute are billed in 15-minute increments and do not have separate initial and Increments additional service increments. **When seven** or more continuous treatment minutes are rendered, a 15-minute increment can be billed (California Code of Regulations, Title 22, Sections 51507[b][5] and 51507.1[b][4]).

This may be found:

<https://www.dhcs.ca.gov/provgovpart/Documents/ACLSS/LEA%20BOP/Program_Req_and_Info/LEA_PM_Searchable_Jan_2019.pdf>

2 – Local Educational Agency (LEA) Service: Nursing   
Outpatient Services – LEA 418 July 2009

The steps for vaccine delivery in educational settings include the following:

|  |  |  |  |
| --- | --- | --- | --- |
| **Time** | **Running Clock** | **Task** | **Rationale** |
| 1 minute | 1 minute | Go to the CDC Website and identify the correct Vaccination Information Statement for the vaccination to be provided to the Student. | The law requires that parents are provided with the VIS information prior to vaccination delivery. |
| 1 minute | 2 minutes | Select the correct vaccination statement, select the correct language for the parent. Download the statement; one for the parent, one for the student’s file. | Parents are multilingual. |
| 1 minute | 3 minutes | Under the Physician’s Standing orders, prepare the student receipt record that contains the Name of the Medication, the dose, the route, the Lot Number, the manufacture the expiration date the name of the practitioner, and area for comments on the student’s response | California Education Code 49423 and 49480 requirements |
| 1 minute | 4 minutes | Prepare the parental consent form and ensure it has the necessary information and questions related to the vaccine being delivered. | Informed consent law and California Education Code 49423 |
| 3 minutes | 7 minutes | Introduce self. Meet with the parent and student. Review the VIS statement, parental consent form and documentation forms with the parent. Answer parental questions | Informed consent |
| 1 minute | 8 minutes | Explain the procedure to the student answer student questions | Informed Consent  Standard of Practice |
| 2 minutes | 10 minutes | Gather materials to include medication, Band-Aid, skin prep material (if appropriate), Sharps container | Preparing for a procedure standard of practice |
| 1 minute | 11 minutes | Wash and dry your hands; dispose of the towel | Standard of practice |
| 2 minutes | 12 minutes | Position the student based upon student preference, prepare the areas for medication delivery and provide patient teaching about the process | Standard of practice |
| 1 minute | 13 minutes | Draw up the medication or prepare the medication | Standard of practice |
| 1 minute | 14 minutes | Deliver the medication, provide reassurance to the student and cover the injection site (if applicable) | Standard of practice |
| 1 minute | 15 minutes | Discard the medication and medication container | Standard of practice |
| 1 minute | 16 minutes | Wash and dry hands discard towel | Standard of practice |
| 2 minutes | 17 minutes | Talk with student and assess student response. | Standard of practice |
| 1 minute | 18 minutes | Document vaccination delivery and share the necessary document with the parent (incase the parent did not bring yellow card.) | Standard of practice |
| 2 minutes | 20 minutes | Log into the CAIRS/Health Futures California Immunization Registry and document vaccination delivery | Required documentation  Standard of Practice |

For the past six years, CSNO has advocated for a State School Nurse Consultant. This example of needing to provide this level of explanation clearly demonstrates this need. This is only one of many instances of where a School Nurses could assist and support the California Department of Health Care Services. Perhaps, there could be consideration that a State School Nurse Consultant could be housed within the California Department of Health Care Services. As always, CSNO will work to support these efforts as well as the full implementation of the SPA 015-021. Please let us know if you have additional questions.

Warmest Regards,

Sheri Coburn

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