



September 2016

Dear School Administrator:

Greetings from the Montana Association of School Nurses (MASN). We wanted to reach out to all school administrators this fall to let you know of a Board of Nursing (BON) Rule change that affects nursing delegation by all nurses. **This change may impact your school, staff and students if or when you employ or contract a nurse to provide school nursing services.**

Since most school districts in Montana do not have a full time school nurse in every school, the appropriate health care required to have equal access to educational opportunities for affected students, including diabetic students needing assistance with insulin administration, has been a challenge. Over the last several years, MASN has worked with the Montana BON to update the delegation rules. **The new rules went into effect this past June 2016.**

The Montana BON definition of [delegation](#) as it pertains to nurses “means the act of authorizing and directing a UAP to perform a specific nursing task in a specific situation.” “[UAP](#)” or an "Unlicensed assistive person" “means any person, regardless of title, who is not a licensed nurse and who functions in an assistive role to the nurse and receives delegation of nursing tasks and assignment of other tasks from a nurse.” In the school setting, a UAP may mean a variety of staff including secretaries, para-educators, teachers, or principals.

Delegation by a nurse as defined by the BON is not the same as a school administrator or a district assigning a (non- nurse) staff member to provide a health care service. There are specific criteria that the situation, task, nurse and UAP must meet in order for the nurse to judge that nursing delegation is appropriate in that specific situation. These specific rules are made by the BON in order to protect the safety of all Montana citizens. **Nursing delegation may not always be appropriate but when delegation is possible, it is a useful mechanism for workload distribution and meeting the needs of students.**

As school nurses digest the new rules, we feel it is imperative that they are given adequate administrative support. The items below detail important caveats and needs that we wanted to make all of you aware of.

- Delegation can be a complex process, more so for complex tasks such as insulin administration.
- Complex health procedures, performed by nurses and/or delegated to UAP’s, require a strategy of care, commonly called an Individualized Healthcare Plan in the school setting.
- The Montana BON rules allow registered nurses (RN) to develop the strategy (plan) of care while licensed practical nurses (LPN) are limited to the contribution to the strategy of care. LPN’s provide care under supervision by certain health professionals (including RN’s) whereas RN’s may provide care without supervision of another health professional and are directly responsible to the consumer. While both LPN’s and RN’s contribute to the care of students, these differences should be taken into account when making hiring decisions.

- Delegation may not always be appropriate i.e. safe. Registered nurses employ professional judgement by assessing, evaluating and planning care. Reasons that the nurse may judge that delegation is not appropriate may include; student and/or family instability or unpredictability; lack of resources for UAP training or supervision; absence of UAP's with needed time, capability or willingness; or a need for ongoing professional assessment, evaluation and/or student teaching while care is delivered.
- Delegation is a skill that many nurses have not yet fully developed, particularly of complex tasks due to previous rule restrictions. Nurses will need supports to develop these skills.
- Delegation of a particular task requires the nurse to be knowledgeable in that task. Being a new school nurse or having a new health task may mean it is not yet appropriate for that nurse to delegate.
- Delegation requires nurse and UAP time for training and supervision.
- The Board of Nursing noted in the rules that there must be supporting policy and procedures for delegation to occur. Please check your district's' board, administrative or departmental policy and procedures for any needed changes.
- Safe delegation and professional standards require documentation. There are some documentation tools available. School nurses need the time to familiarize themselves with those tools and when needed, to edit them to fit their unique school environment needs.
- While it is unfortunate that Montana is one of the few states that does not currently employ a state level school nurse consultant, the Montana Association of School Nurses provides professional relationships and conferences that promotes the proficiency of school nursing. **We encourage school administrators to support their school nurses to be members of MASN and to attend bi-annual education conferences.** There is also an excellent comprehensive annual summer national conference by the National Association of School Nurses.
- This October, MASN will hold their conference in conjunction with MEA in Helena. The Director of the Board of Nursing will speak about the new delegation rules. Please encourage and support your school nurse to attend.

Thank you for your attention to this important change. If you have questions about nursing delegation, please contact the Board of Nursing. We have included some resources below that you may find helpful.

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Resources:

[Montana Association of School Nurses](#)

[Montana Board of Nursing: Delegation Rules : We have also sent you an attachment provided to MASN by the BON that encapsulates the changes.](#)

[Montana BON response to public comment re: delegation rule changes](#)

[Montana Department of Health and Human Services: School Health](#)

[National Association of School Nurses Position Statement: Nursing Delegation](#)

[National Association of School Nurses Position Statement: Role of the 21st Century School Nurse](#)

[National Association of School Nurses Position Statement: Individualized Healthcare Plans](#)

[National Association of School Nurses Position Statement: Role of the LPN](#)