

Comment Report

SF 103

A bill for an act relating to seizure disorders and establishing certain requirements for school districts, accredited nonpublic schools, and the department of education.

Subcommittee Members: Cournoyer-CH, Sweeney, Trone Garriott

Date: 01/27/2021

Time: 02:00 PM

Location: RM 24A

Name: Margaret Buckton

Comment: UEN is Opposed: we want to start by saying that we strive to keep every student safe in our schools, including students with seizure disorder. The following was gleaned from Health Services Directors of UEN schools as reason for our opposition.

1. Medication administration in Iowa schools is a nursing delegated task. Nurses need to determine who to train, based on nursing delegation principles. So saying that a person needs to be "trained" to administer the medication/VNS does not take into account the laws that are already in place. It is not as simple as just identifying a person to train. Training is the last step in nursing delegation.
2. The bill page 1 line 34 requires every school attendance center shall provide training to all school personnel on the recognition of the signs and symptoms of seizures and the appropriate steps for seizure first aid. To try to ensure that ALL staff in a district are trained, where many employees don't have direct student contact roles, would not improve safety for students experiencing a seizure and would be very difficult to track and enforce, not to mention costly in terms of both pay for employees and time not dedicated to other training requirements.
3. This bill on page 2, beginning on line 23, gives parents the option to collaborate with the nurse or the IEP team to develop a plan. This is inconsistent with the rules in IAC Chapter 14. School nurses are responsible for writing Individual Health Plans (IHP's) and Emergency Plans (EP's), with seizure first aid instructions, for all students with a seizure disorder, (except sometimes for students with what is commonly known as absence seizures staring off for a couple of seconds), and that information must be shared with all people who work directly with that student including bus drivers, paras, teachers etc.
4. School nurses are already required by law to do what the proposed legislation is suggesting; we case manage and coordinate the care for ALL students with ANY health condition, not just seizures. School nurses should be the ones to determine the best way to manage student health conditions in schools and provide the training that is available from multiple sources, the Epilepsy Foundation is just one source. School nurses are ultimately responsible for managing chronic health conditions in schools and are the licensed medical personnel who determine how the plan will be implemented to ensure student safety.
5. This law is redundant and would not protect student safety. It is also not equitable, as it picks one health condition, over the myriads of others we encounter in schools, as more important and in need of special laws.