



December 8, 2021

TO: Rep. Pamela Hornberger, Chair
Members of the House Education Committee

FROM: Amy Zaagman, Executive Director
azaagman@mcmch.org or 517-230-1816
and Rachel Vandenbrink, President, Michigan Association of School Nurses

Re: Comments to HB 4970

SUSTAINING MEMBERS

Beaumont Children's Hospital

Children's Hospital of
Michigan/Detroit Medical Center

Henry Ford Health System

Hurley Medical Center

University of Michigan C.S. Mott
Children's Hospital and Von
Voigtlander Women's Hospital

CONTRIBUTING MEMBERS

Michigan Section, American
Congress of Obstetricians and
Gynecologists

Mott Children's Health Center

School-Community Health
Alliance of Michigan

PARTNERING MEMBERS

Calhoun County Public Health
Department

Health Department of Northwest
Michigan

Inter-Tribal Council of Michigan

Michigan Association for Infant
Mental Health

Michigan Breastfeeding
Network

Michigan School Health
Coordinators' Association

Michigan State Medical Society

Washtenaw County Public
Health

GENERAL MEMBERS

Maternal-Newborn Nurse
Professionals of Southeastern
Michigan

Michigan Association of School
Nurses

Michigan Chapter, National
Association of Pediatric
Nurse Practitioners

Nurse Administrators Forum

EXECUTIVE DIRECTOR

Amy Zaagman
azaagman@mcmch.org

The Michigan Council for Maternal and Child Health and our member organization the Michigan Association of School Nurses (MASN) are dedicated to optimal learning in the educational setting while improving student health and safety. We know that the sponsor, the committee members and the Epilepsy Foundation share these goals.

We are appreciative of the committee's attention to HB 4970 to improve the health and safety of students with epilepsy and seizure disorder, but we have several concerns about the direction of this legislation and specific bill language.

First, and in keeping with the Legislature's commitment to fund school health professionals in schools in the FY 22 school aid budget, we want to stress that the safest scenario for a child with any chronic health condition is to have a licensed registered professional nurse on site, one who can use the years of clinical training to assess and respond to any routine or emergency situation. Combined with recent efforts to establish medical emergency response teams in schools, we believe we can do better for all children including those with seizure disorders. We are concerned that legislative efforts to elevate individual conditions and to substitute staff with minimal training for a fully trained and qualified school nurse will do all children and those efforts a disservice in the long run.

We also fully understand and appreciate the urgency to improve safety for students with seizure disorders, and to give them and their families some level of comfort regarding response consistent with their seizure action plan. Specifically to HB 4970 we would like to see a differentiation in the trainings given to school nurses and other employees without any clinical background. We would ask for an additional subsection that makes it clear that employees who complete the training must receive the it under the supervision of, and have evaluation by, a licensed registered professional nurse, similar to PA 187 of 2013 that regulates the use of epinephrine auto-injectors to respond to anaphylaxis (see pg. 9, [Laws and Model Policies that Guide School Health Service Programs in Michigan](#)).

It is also in keeping with the National Association of School Nurses Tiered Training Model for Teachers and School Personnel which states that training should be facilitated by the school nurse or another licensed healthcare professional that works with the school. There are three levels of training: Tier 1, Tier 2 and Tier 3 (page 6, [Michigan School Health: Seizure Rescue Medications](#)).

We look forward to working together on HB 4970 and adding Seizures to the list of conditions in the statutes and model policies that school staff, led and trained by school nurses, are equipped to respond to in keeping our kids safe in Michigan. And we will continue to work with the Governor, Legislature and other leaders in the school community to see a professional school nurse available to every child, in every school building in our state.