

Resolution Comments

From: Kim Van Atta [kim.vanatta@gmail.com]
To: Resolution Comments
Cc:
Subject: Amendments to Article 47
Attachments:

Sent: Sun 4/26/2009 10:10 PM

Rena Bryant
Secretary to the Board of Health

Dear Ms. Bryant,

I write to offer my strong support for the proposed amendment to Article 47 that will make it consistent with OCFS regulations on the administration of medications in child care programs. I am an RN who has worked for the past 7 years in Head Start and Day Care settings, either as an employee or as a health consultant. In addition, as a trainer for the OCFS Medication Administration Training program, I have certified more than 450 child care providers in New York City to administer medication. It has always been clear to me that the omission in Article 47 of the provision, as written in the OCFS regulations regarding medication routes of administration not covered in the MAT certification process, was a simple oversight. The intent of the DOHMH to fully support inclusion of children in child care with medication needs not covered in the MAT program has always been evident to me, both in word and deed.

I am particularly pleased to see that the amendment includes a specific statement to the effect that if a child care service chooses not to administer medication it does not exempt them from the need to comply with the Americans with Disabilities Act. This understanding has always been implicit, but I think making it explicit brings a welcome clarity, and is a strong statement of DOHMH support for inclusion of children with medication needs in our child care programs.

It should also be noted that the cost of MAT certification, as outlined in the regulations, is currently fully reimbursable by New York State. I am very aware of the economic challenges that child care services face, and have worked with a number of struggling programs. But cost should not be an argument for opposing this amendment.

Kim Van Atta RN BSN
223 Washington Ave.
Brooklyn, NY 11205
917-657-1050

April 27, 2009

RE: Article 47 Revision, Administration of Medications

Dear Members of the New York City Public Health Council:

I am writing as a clinical endocrinologist practicing in New York City, Director of Endocrinology at New York Hospital Queens, and as a volunteer and past national Board member with the American Diabetes Association to express the support of the Association for the proposed revision to Article 47. This revision pertains to the administration of injectable medications in day care settings. The change will bring the city's regulation into accordance with the state's regulations on this subject, as overseen by the New York Office of Children and Family Services. The revision of Article 47 that was adopted last year inadvertently did not include this provision.

Currently, non-medical day care staff can receive training in order to administer medications to children in the care of their program. The proposed revision would clarify that the administration of injectable medications, such as insulin and glucagon, would also be permissible. These medications are commonly needed for children with diabetes (insulin is vitally necessary for all children with type 1 diabetes and must be administered multiple times each day; glucagon is used for low blood sugar emergencies), and are administered by non-medical staff in numerous settings across the country.

The use of trained non-medical staff to administer such care for children with diabetes is widely endorsed within the diabetes medical community. Organizations supporting this position include:

- American Diabetes Association,
- Pediatric Endocrinology Nursing Society,
- American Association of Diabetes Educators,
- American Association of Clinical Endocrinologists, and
- American Academy of Pediatrics

I appreciate your consideration of the proposed change to Article 47. And on behalf of the American Diabetes Association, I urge the Council's adoption of the proposed revision.

Sincerely,

Daniel Lorber, MD, FACP, CDE

Daniel L. Lorber, MD, FACP, CDE
59-45 161st Street
Flushing, NY, 11365

New York City Office
333 Seventh Avenue, 17th Floor
New York, NY 10001
Tel: (212) 725-4925

Diabetes Information
call 1-800-DIABETES (1-800-342-2383)
online www.diabetes.org
The Association gratefully accepts gifts through your will.

**The Mission of the American
Diabetes Association is to prevent and
cure diabetes and to improve the lives of
all people affected by diabetes.**