



Dennis M. Walcott
Chancellor

Public Comment Analysis

Date: August 21, 2012

Topic: Proposed Amendments to Chancellor's Regulation A-715

Date of Panel Vote: August 22, 2012

Summary of Proposed Amendments to Chancellor's Regulation A-715

The New York City Department of Education recognizes that severe allergic reactions leading to anaphylaxis are a life-threatening medical emergency. Chancellor's Regulation A-715 sets forth a plan to reduce the risk of exposure and allow treatment with single-dose epinephrine auto-injector devices ("epi-pens").

The prior version of the regulation, dated May 30, 2007, is being amended in the following respects: (1) to reflect new guidelines from the National School Boards Association on availability of epi-pens; and (2) to make the standing order for the administration of epinephrine available on the Office of School Health website.

Summary of Issues Raised in Written and Oral Comments and Significant Alternatives Suggested

Comments received are summarized as follows:

1. Further clarity in the recognition and progression of symptoms on the Allergy Response Plan is needed. Signs and symptoms should include "drooling from the mouth indicating a restricted airway."
2. The Allergy Response Plan does not indicate steps for a secondary reaction.
3. The diagram should show that the epi-pen can be administered through clothing.
4. Additional training is needed for school personnel volunteers.

Analysis of Issues Raised, Significant Alternatives Proposed, and Changes Made to the Proposal

With regard to comment 1, the DOE has already included “difficulty swallowing” (could cause excessive secretion) as one of the symptoms of anaphylaxis.

With regard to comment 2, the DOE believes that it is not necessary to include steps for a secondary reaction. Any student who has been administered an epi-pen will not remain in school, but rather will be sent to the emergency room via EMS. Upon administering an epi-pen, EMS must be notified immediately by calling 911.

With regard to comment 3, the DOE believes that although it is technically true that the visual does not show the epi-pen can be administered through clothing, the diagram (visual) was obtained from the Food Allergy and Anaphylaxis Network (FAAN) and is adequate. In addition, all unlicensed personnel will be trained by licensed staff before performing this task. Included in the power point presentation used for training personnel is a slide indicating “auto injector is designed to work through clothing.” The power point also has a visual showing the injector being placed into the thigh through pants.

With regard to comment 4, training for staff covers all necessary topics including the need to call 911.

The DOE has made no changes to the proposed amendments to the regulation. The regulation will be presented to the Panel for Educational Policy as posted.

A copy of the proposed Regulation can be obtained at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/August2012PEPRegulations.htm>.