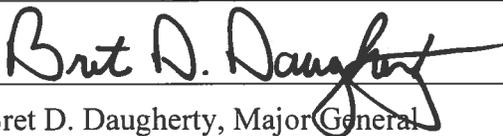




## Department Policy No. WYA-701-11

<b>Title:</b>	Washington Youth Academy Health Center
<b>Authorizing Source:</b>	RCW 28A.210 Health Services Schools RCW 18.71 Medical License Requirements
<b>Information Contact:</b>	Washington Youth Academy Director Bremerton, WA (360) 473-2612
<b>Effective Date:</b>	October 1, 2011
<b>Mandatory Review Date:</b>	November 1, 2017
<b>Revised:</b>	November 1, 2013
<b>Approved By:</b>	 Bret D. Daugherty, Major General The Adjutant General Washington Military Department Director

### Policy

The health, safety and security of cadets are a priority at the Washington Youth Academy (WYA). Improper responses to health issues have the potential to develop into more serious or widespread health problems. It is our goal to assist cadets in maintaining good health. In order to support a healthy environment for cadets an onsite Health Center/First Aid Station is available to provide limited non-Licensed Medical Provider (LMP) services. This policy establishes the policy and procedures in the Washington Military Department (WMD) Washington Youth Academy (WYA) that:

1. Governs the availability, use and requirements of the Health Center/First Aid Station; and
2. Provides self-administered medication guidelines to cadets and staff.

### Scope

This policy applies to all WYA staff, volunteers, and residential cadets.

### Definitions

- **Candidates:** Individuals accepted into the program who are in the Acclimation Phase of the program.
- **Cadets:** Candidates who have successfully completed the Acclimation phase and enrolled into the Residential Phase of the program.

- **Health Center:** The WYA office designated to facilitate first aid services for cadets, coordinate compliance with cadet's Licensed Medical Provider (LMP), Self-administered medications (creams, inhalers, insulin, eye drops and Epi-Pens); all other medications are distributed by trained WYA staff members to cadets who take the medications in the presence of the WYA staff member under the delegated authority of the Washington Youth Academy registered nurse and in accordance with RCW28A.210.260 paragraph 5, provide educational health information, and provide home-style care at the cadet's request.
- **Health Center Assistant:** A staff member who assists with first aid and other duties in the Health Center under the direction of the Health Center Coordinator.
- **Health Center Coordinator (HCC):** A Registered Nurse responsible in providing technical and medical leadership for the WYA Health Center.
- **Health Insurance Portability and Accountability Act (HIPAA):** The Act that requires the adoption of standards for protecting the privacy of individually identifiable health information.
- **Family Educational Rights and Privacy Act (FERPA):** The Act that requires the adoption of standards for protecting the privacy of individually identifiable student education records.<sup>1</sup>
- **Home-style Care:** Wellness care normally provided by a parent or guardian in a residential setting for minor health issues (i.e. colds, cuts, rashes, etc.) generally identified by cadets without the aid or instructions of a LMP.
- **Licensed Medical Practitioner (LMP):** A community-based licensed medical provider selected by the cadet/cadet's family or urgent medical services provider who diagnoses conditions, writes health orders and prescribes medications.
- **Medications - Non-Prescription:** Medications sold over-the-counter without a prescription to treat specific medical conditions; (see attachment 1).
- **Medications - Prescriptions:** Medications prescribed by a LMP to treat a specific medical condition with distribution instructions and filled by a licensed pharmacy.

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<sup>1</sup> In most cases, the *HIPAA* Privacy Rule does not apply to an elementary or secondary school because the school either: (1) is not a *HIPAA* covered entity or (2) is a *HIPAA* covered entity but maintains health information only on students in records that are by definition "education records" under *FERPA* and, therefore, is not subject to the *HIPAA* Privacy Rule. At the elementary or secondary school level, students' immunization and other health records that are maintained by a school district or individual school, including a school-operated health clinic, that receives funds under any program administered by the U.S. Department of Education are "education records" subject to *FERPA*, including health and medical records maintained by a school nurse who is employed by or under contract with a school or school district. Notwithstanding the source of the funding, if the nurse is hired as a school official (or contractor), the records maintained by the nurse or clinic are "education records" subject to *FERPA*. See 34 *CFR* § 99.3 and 45 *CFR* § 160.103.

## **Responsibilities**

### **A. Health Center Coordinator**

1. Assists recruiting staff with review of program application packet for medical information to provide staff with a clear understanding of how each applicant's on-going medical conditions and care may affect the applicant's ability to participate in the WYA program.
2. Assists with Cadet application process, orientation and intake:
  - a) Reviews medical information packet at orientation to ensure completeness, medical form signatures, signed release of liability form, and proof of medical insurance.
  - b) Receives and ensures that all medications meet general medication standards during intake. Medications not properly identified, expired, or appears altered will not be accepted. Ensures medications properly identified in a cadet's LMP health plan are kept in a secure location for distribution as appropriate.
3. Provides general wellness and healthcare related training to staff and cadets:
  - a) Provides assigned staff, contract staff, and volunteers with effective training to include discussion, questions and answers to the following:
    - i. FERPA rules concerning the confidentiality of health/educational records;
    - ii. Instructions on how to distribute medications and any special requirements identified by the LMP associated with each medication;
    - iii. Appropriate responses to medical conditions such as Asthma, Seizures, or Diabetes; and
    - iv. Updates staff when there are changes in a cadet's health plan or medications.
4. Coordinates all residential healthcare services:
  - (a) Maintains communications with LMP.
    - i. Discusses LMP health care plans received through local medical services when there are questions or concerns.
    - ii. Coordinates with LMP and parent/guardian with health plan problems such as conflicting medication or non-compliance by the cadet.
    - iii. Develops and monitors individual health plans (IHP), medication or treatment orders and ensures staff understand IHP requirements when new LMP information is received.
  - (b) Maintains communications with parents/guardians to ensure:
    - i. Medication releases are current for any new medications;
    - ii. Coordinates routine medical appointments for home visits; or
    - iii. Notifies the parent/guardian of any medical problems.
  - (c) Attends to cadet's need during sick call by providing home-style care and education for the condition identified in a self-care plan by the cadet or staff.

5. Trains assigned WYA staff to prevent and manage potential viruses, infections, or infestations that could spread between cadets in close living quarters;
6. Trains assigned WYA staff on how to properly distribute medications;
7. Maintains an education health record for each cadet;
8. Receives medications from pharmacy or parents and provides distribution instructions;
9. Coordinates with LMP and parent when necessary to clarify health plan;
10. Ensures assigned WYA staff are trained on FERPA health/education record compliance;
11. Monitors and review medication administration records on a consistent basis; and
12. Develops cadet Individual Health Plan (IHP) when necessary.

#### **B. Health Center Assistant**

1. Assists the HCC and LMP in providing continuum of healthcare for cadets.
  - a) Provides basic first aid and performs routine home healthcare functions including self-medication administration.
  - b) Assists with cadet self-administered medication process, maintains medication logs, inventories medications, and verifies medications are properly secured.
2. Transports cadets to and from medical/dental appointments and emergency clinics.
  - a) Assists with sickbay oversight; monitors cadets when assigned to sickbay.
  - b) Schedules medical appointments with outside providers.
  - c) Facilitates urgent and/or emergency care as necessary.
  - d) Ensures healthcare providers have access to required insurance information at or before the time of service as appropriate.
  - e) Promptly directs any billing or insurance payment inquires to the cadet's parents/guardians.
3. Provides clerical assistance in support of Health Center operations including records maintenance, appointment scheduling, and ordering supplies.
  - a) Reviews and updates Health Center records for cadets utilizing the Health Center records system.
  - b) Ensures the Health Center is safe, clean, and well-stocked.
  - c) Ensures that the medication carts are clean and well stocked.
4. Communicates with parents, WYA registered nurse, and others as required in order to carry out the duties of the position.
5. Works collaboratively with cadre team members and supervisors.
  - a) Assists in the reception/intake process, verifies completed forms and releases, and

ensures complete medical records for new cadets.

### **C. WYA Cadre Staff**

- 1.) Ensures cadets have access to receive assistance as appropriate from the Health Center;
- 2.) Complies with cadet IHP instructions as provided by the Health Center staff in accordance with the LMP;
- 3.) Assists with self-administered medications according to training, policy, and reports issues as needed; and
- 4.) Transports cadets to urgent care, medical appointments or other medical services as needed in the absence of Health Center staff.

### **Procedures**

These procedures establish the healthcare process WYA academy staff will use to support and operate the Health Center/first aid station to provide cadet healthcare services. FERPA standards will be maintained to protect cadet's medical education records as confidential. Only health center staff have access to the records. Sensitive information is passed on verbally.

#### **A. Medical Records and Development of Cadet Individual Health Plans**

1. The WYA candidate application includes the following medical information:
  - a) Known medical/dental conditions:
    - i. Type of medical/dental care needed;
    - ii. List of medications used by cadet applicant; and
    - iii. Health plan coverage verification.
  - b) The HCC reviews applications and assists recruiting staff by identifying cadet's medical requirements and required treatment or health care issues that may impact a candidate's ability to successfully complete the program.
2. Candidates accepted into the WYA will have their medical health plan information transferred to the Health Center to be placed in an individual health file which may include:
  - a) Medical/dental care needs identified by the candidate's LMP assessment;
  - b) Prescription medications that will need to be dispensed;
  - c) Non-prescription medication that the candidate will be allowed to receive; and Consent for treatment form, release of medical information and authorization for "future" medical treatment
  - d) Other special instructions for their medical/dental conditions.
3. The HCC documents and files IHP in candidate's health file.
4. The HCC trains WYA staff on necessary medical information to facilitate compliance with each cadet's IHP.

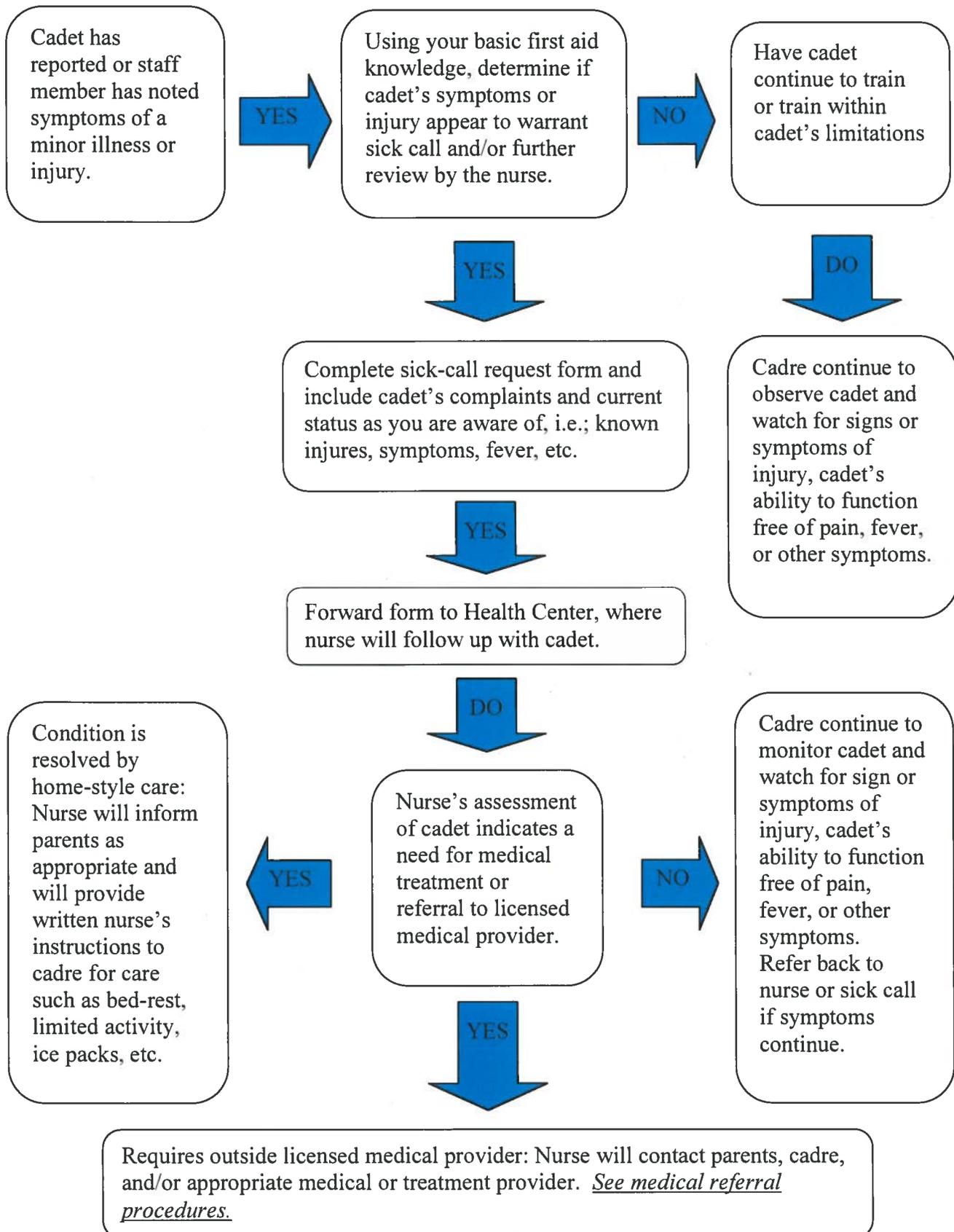
5. Health Center staff maintains candidate/cadet confidential health plan information in a secure, locked file and/or database system and shares only with appropriate individuals in compliance with FERPA standards.

## **B. Health Center/First Aid Station Usage**

1. The WYA Health Center staff are responsible to:
  - a) Ensure cadets receive the following:
    - i. First-aid for non-life threatening medical emergencies;
    - ii. Assistance with calling and coordinating emergency medical services if appropriate; and
    - iii. Home-style care of minor aches, sprains, strains, and/or general illnesses.
  - b) Coordinate compliance with LMP healthcare plan;
  - c) Distribute wellness educational materials;
  - d) Isolate a cadet in the sick room to prevent the spreading of a contagious disease such as a flu while the cadet receives home-style care;
  - e) Ensure distribution of non-prescription and prescription medication in accordance with the cadet's LMP health plan;
  - f) Recommend evaluation and care by a LMP;
  - g) Assist staff with cadet program drug screening; and
  - h) Assist staff with cadet pregnancy testing.
2. "Sick Call" Access:
  - a) Cadet submits request by completion of a "Sick-Call Request" form and process as follows:
    - i. The cadet gives the form to his or her Cadre Supervisor or Team Lead.
    - ii. The Cadre Supervisor or Team Lead reviews the request form to identify the cadet's specific need(s) and attempts to resolve the issue by following WYA protocols
    - iii. If the cadet's concern is addressed at the Platoon level by available resources (example: provided an ice pack for an aching joint), sick call form will be forwarded to the Health Center for review.
    - iv. If the issue is not addressed, or the cadet still wants to request to attend sick call, or if WYA protocol dictates, the cadet will attend the next scheduled sick call at the Health Center.
    - v. Refer to the Cadet Sick Call Procedures (flow chart C) for the specific process.
  - b) Platoon staff completes Sick-Call Request when a cadet is referred to the Health Center for a medical issue that WYA staff believes needs to be addressed even if the cadet has not made a request for sick call. The Health Center Staff may review the issue with the cadet for health education purposes.
3. The WYA does not offer a physician or 24-hour nursing care. Availability of services is limited and does not provide:
  - a) Health insurance;
  - b) On-site physician;
  - c) Payment for medications or LMP care; or

- d) Clinical services to diagnose illnesses, prescribe medication, or alter a LMPs health order; or
- e) Personal medical services for staff.

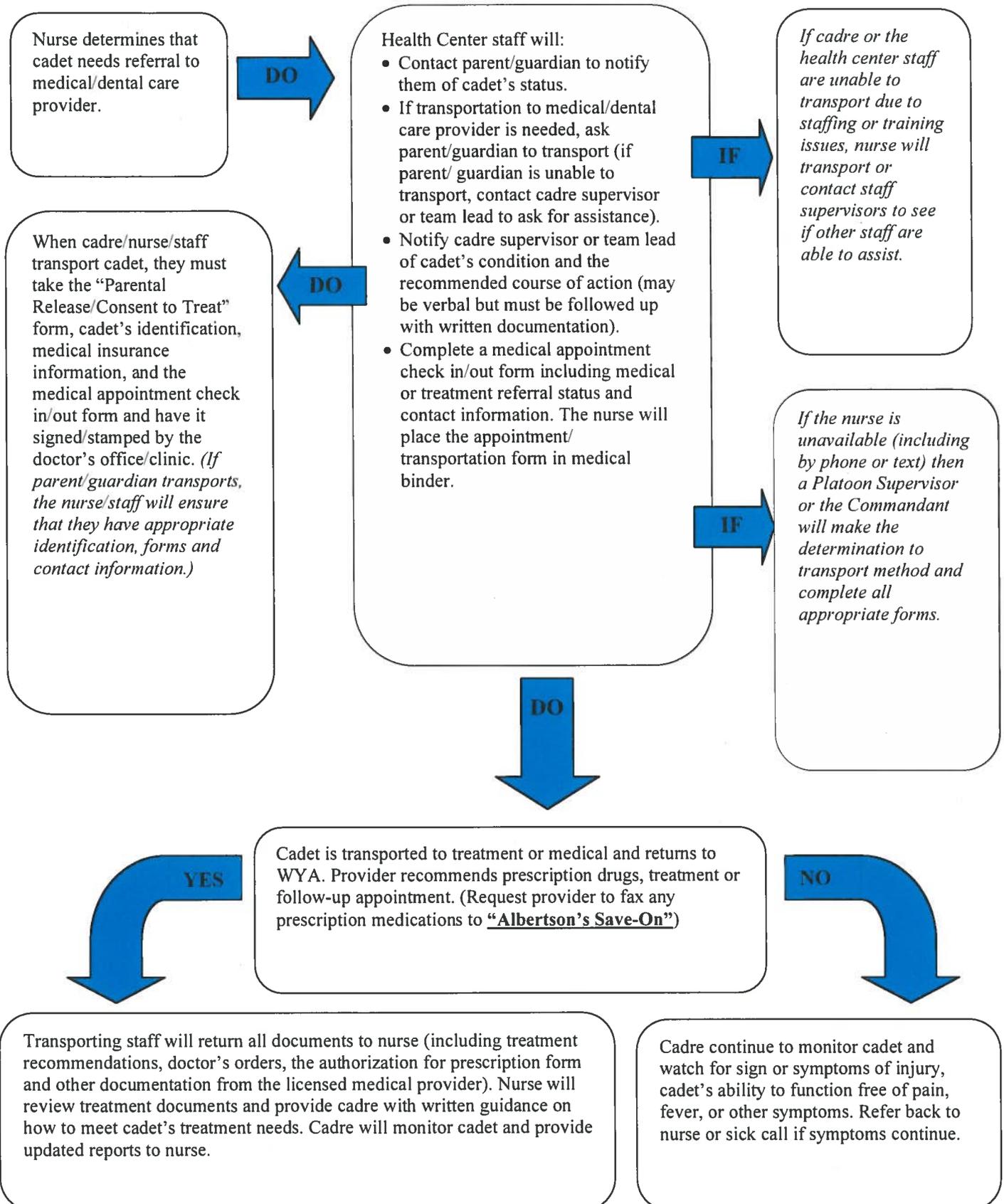
### C. Cadet Sick Call Procedures



**D. Health Care Needs including Routine, Urgent and Emergency Medical Services**

1. Cadets with a serious health condition needing care by a LMP will be assessed by Health Center staff to determine the appropriate type of medical/dental services. Refer to Medical or Treatment Referral Procedures (flow chart E) for the proper process.
  - a) Emergency medical services are when a cadet is treated by local emergency service providers called to respond to life threatening medical emergencies.
  - b) Urgent medical services are when a cadet is taken to a local LMP for urgent medical services such as hospital or clinic to address urgent medical/dental that needs diagnosis and treatment.
  - c) Scheduled medical services are communicated with the Parent/guardian to coordinate medical care with their regular LMP or medical needs that impact their ability to participate in the program.
  
2. The cadet's parent/guardian will be contacted if:
  - a) The cadet is taken off-site for urgent/emergency medical/dental services;
  - b) The cadet needs to be taken by the parent/guardian for medical services; and/or
  - c) Participation in the WYA program is seriously impacted due to medical issues, in which case discussion may include program options.
  
3. Off-site licensed medical/dental service providers will provide staff with a report that includes a summary of services and health plan for the following:
  - a) If no new health care, treatment plan or follow up treatment is identified or necessary, cadet will immediately return to standard program activities.
  - b) If new temporary health plan is identified, such as medication:
    - i. The new medication will be added to the cadet's medication list for distribution in accordance with the instructions (see chart H).
    - ii. The HCC is notified to set-up a new dispensing sheet by the next normal business hours.
  - c) If new health plan is identified that has detailed care instructions that impact program:
    - i. The new medication will be added to the cadet's medication list for dispensing in accordance with the instructions.
    - ii. Medical care instructions and activity restrictions will be provided to the HCC and appropriate management staff to ensure the health plan is followed.
    - iii. Dependent on the treatment requirements, the cadet may be considered for release from the program. This decision may include the HCC, WYA Director and/or Deputy Director and other assigned staff as appropriate.

### E. Medical or Treatment Referral Procedures



#### **F. Self-Administration of Medication Procedures**

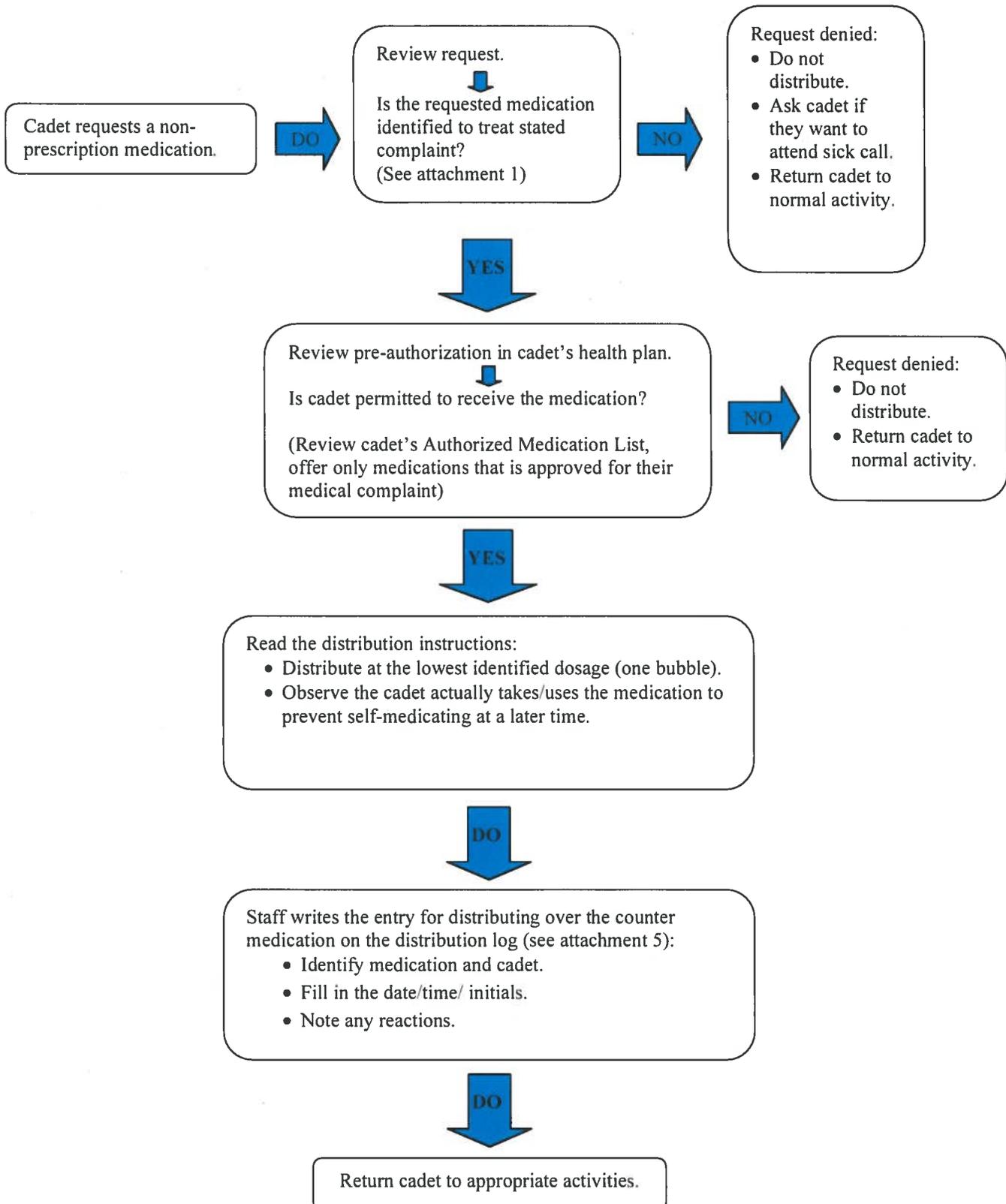
1. The HCC is responsible for pharmaceutical product control and to:
  - a) Ensure that medications are appropriately packaged such as in a bubble pack system to eliminate any confusion from staff on distribution dosage.
  - b) Monitor short-term medications that may be distributed for 15 days or less in compliance with LMP without an IHP.
  - c) Coordinate distribution of new prescription received after hours or weekend.
2. Authorized WYA staff will assist cadets with self-administered medications in accordance to distribution instructions.
3. Locked medication carts are used to control unauthorized access to medications. Carts are locked and stored in the Health Center/First Aid Station.
4. Medication Distribution:
  - a) Oral medications are generally bubble wrapped into one dose per bubble;
  - b) Medications requiring refrigeration will be stored in the Health Center medication refrigerator in accordance with refrigerator requirements (see attachment 2);
  - c) The cadet will take his or her unused medications with him or her when he or she permanently leave the WYA; and
  - d) The WYA will not provide or approve the dispensing of other varieties of over-the-counter medications that are not listed on attachment 1. Any medication not listed must have a prescription from a LMP and be dispensed by a licensed pharmacy to ensure appropriate application and dosage.
5. See Dispensing Flow Charts G, H, and I for dispensing instructions.

#### **G. Medication Distribution Issues**

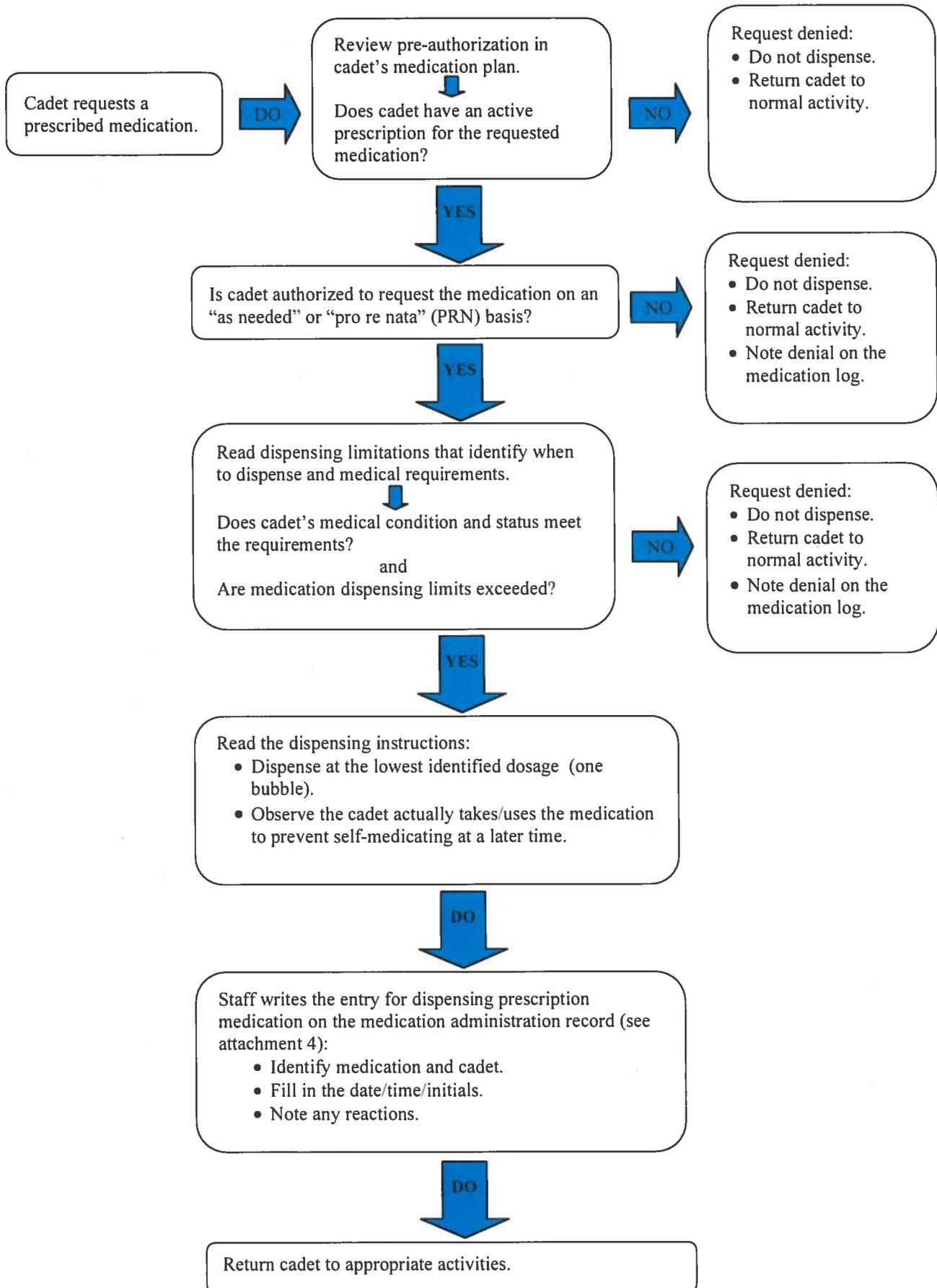
1. If a cadet declines or abuses his or her prescription medication:
  - a) Staff will complete a Medication Distribution Program Report (see attachment 3) to report the issue and give to the HCC;
  - b) The HCC reviews the report and may work with LMP and management to identify any potential health or program impact; and
  - c) Management staff may choose to take action up to and including dismissal of the cadet from the academy after an assessment that may include meeting with the cadet, meeting with parent/guardian, and discussion with cadet's LMP.
2. WYA Staff Self-Administration of Medication Problems:
  - a) If a WYA staff member has become aware of an error or problem with a medication or completing any associated tasks, management and the HCC will be notified (see attachment 3). The report needs to identify the issue in detail. If the issue results in a medical emergency, Emergency Medical Services or Urgent Medical Services will be utilized, as appropriate.
  - b) The HCC will receive a copy of the report and review the cadet's health record and IHP to determine the impact.

- c) A summary of medication issues involving staff will be provided to the designated management member. Management will determine appropriate action which may include:
  - i. Discussing issue with staff;
  - ii. Retraining; and/or
  - iii. Corrective or disciplinary action.

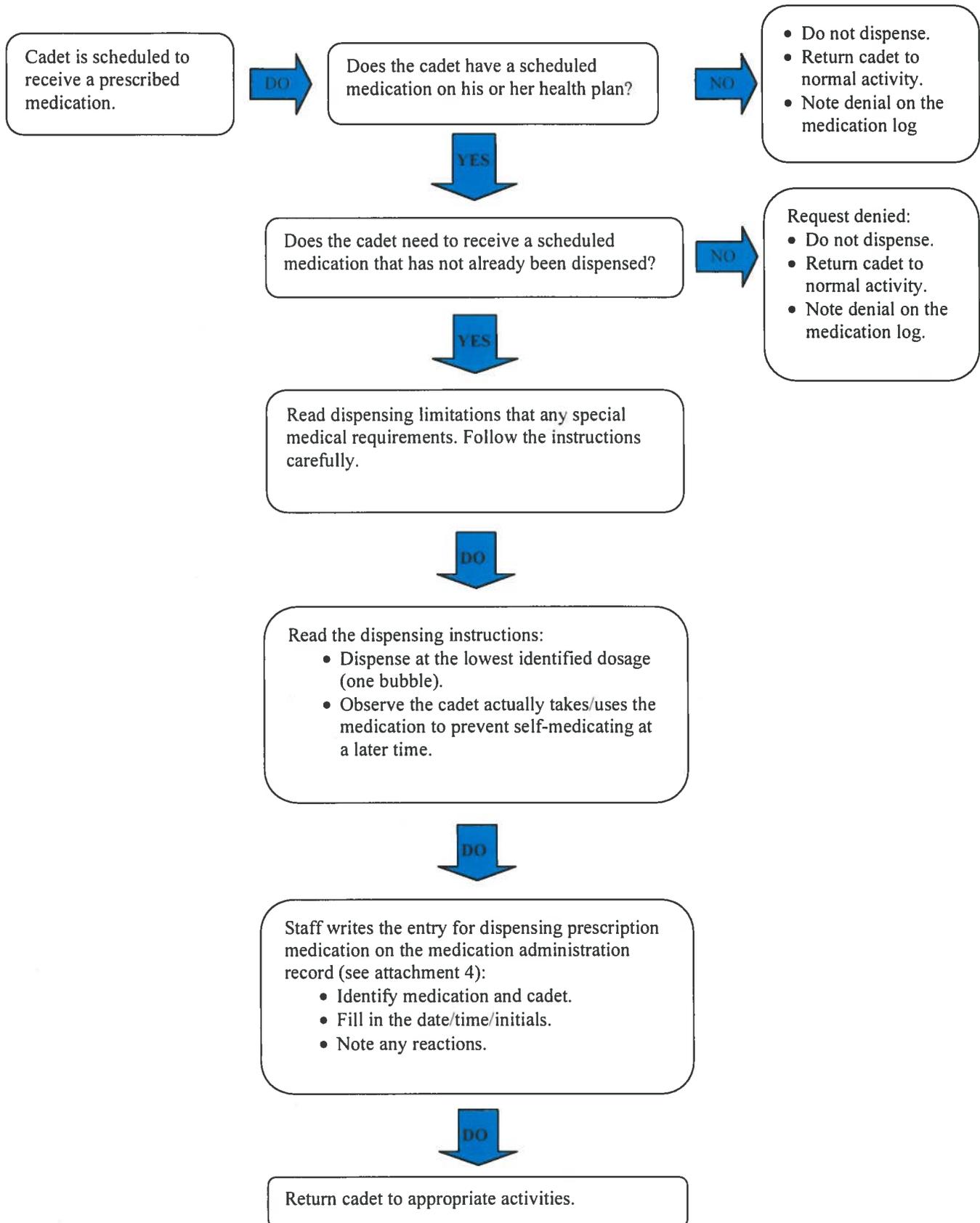
**F. Distributing Medications – Non-Prescription Requested by Cadet**



### G. Distributing Medications – Prescription by Cadet Request



### H. Medications – Prescription that is on a Regular Dispensing Schedule



**Attachment 1**

**Non-Prescription Medication**

<b>Health Complaint</b>	<b>Medication</b>
Acne	Phisoderm Cleaner Benzoyl Peroxide or Cream
Allergies	Benadryl (Night only) Sudafed non-drowsy
Athlete's Foot	Lotrimin Antifungal cream or spray
Bee sting	Monosodium Glutamate Benadryl Cream/Topical Spray Calamine Lotion
Clean Wax from Ears	Debrox Hydrogen Peroxide
Clean Wound	Phisoderm Hydrogen Peroxide Betadine
Colds	Sudafed Dayquil Benadryl (Night Only) Nyquil (Night Only)
Cold Sores, Chapped Lips	Carmex A&D Ointment Orabase Oragel Abreva
Cough	Mucinex Mentholatum Throat Lozenges (Various)
Cuts, Scrapes, Lacerations	Bacitracin Triple Antibiotic Ointment Betadine
Eye Irritation	Artificial Tears
Ingrown Toenail	Triple Antibiotic Ointment Epsom Salt Soaks
Irritated Skin, Bug Bites	Aloe Gel Calamine Cortaid Benadryl Cream/Topical spray Solarcaine Hydrocortisone Cream
Lice Treatment	RID Lice Killing Shampoo/Spray Treatment
Minor Burns/Sunburn	Aloe Vera Gel Noxema Second Skin Triple Antibiotic Ointment Sunscreen Lotion/Gel/Spray
Nosebleeds	Triple Antibiotic Ointment Ocean Spray Afrin
Pain, Fever, Headache	Tylenol Ibuprofen
Sore Muscles	Ben Gay Epsom Salts
Sore Throat	Throat Lozenges (Various) Chloroseptic Spray
Sore Rectum	Preparation H Desitin
Upset Stomach	Tums

**Attachment 2**

**WASHINGTON YOUTH ACADEMY  
REFRIGERATOR TEMPERATURE AND CLEANING LOG PROCEDURE**

**PURPOSE** To maintain appropriate temperatures in all student medication and food storage refrigerators. To ensure food/drinks are discarded by the expiration dates.

**SUPPORTIVE DATA** If the unit or department is closed on weekends, holidays or other days, a thermometer with memory capabilities is required to assure appropriate and safe temperatures for food, drink and medications.

**CONTENT**

<u>STEPS</u>	<u>KEY POINTS</u>
1. Temperatures of all medication refrigerators must be recorded every day. Temperatures for Vaccines require recording <u>twice a day</u> or ongoing monitoring.	<ul style="list-style-type: none"><li>• Temperature Ranges: Medication 35°-46°F.</li><li>• Dispensary staff record temperatures.</li><li>• Nursing is responsible for filing the sheets in the dispensary.</li><li>• Dispensary closed on weekends/holidays will have a memory thermometer.</li></ul>
2. Medication refrigerators are cleaned/defrosted at least monthly and as necessary.	<ul style="list-style-type: none"><li>• Area responsible for cleaning: -Dispensary staff</li></ul>
3. Record temperature on 'Refrigerator Temperature and Cleaning Log'.	<ul style="list-style-type: none"><li>• Record temperature twice daily.</li><li>• Initial on the appropriate date.</li></ul>
4. If the temperature is out-of-range, Dispensary staff will adjust the temperature and document on the appropriate section the action taken. Staff will notify the nurse supervisor of the adjustment. The staff member is responsible to recheck the temperature within 2 hours. If the temperature is still not within normal range, the staff will notify nurse supervisor. The staff will note this communication on the appropriate section of the log.	<ul style="list-style-type: none"><li>• Nurse supervisor will call the vaccine manufacturer(s) to determine whether the potency of the vaccine(s) has been affected.</li><li>• Nurse supervisor will call the immunization program at Kitsap County Health department for further assistance (360)337-5238</li></ul>