

# Animals in the Schools: Guidelines for Reducing Exposure to Allergens

## Background:

Asthma can be a leading cause of school absences. It is not unusual for students with poorly controlled asthma to miss more than 10 school days per year due to asthma; children with poorly controlled severe asthma may miss more than 30 days during a school year. Time lost from school negatively affects grades, academic achievement, self-esteem, and future life successes.<sup>1</sup> There is a high prevalence of asthma and other allergy-related conditions among students in the MPS. The national average is 7.5% (CDC 1999) and in MPS, the prevalence is 12.1% (Annual Health Information form 2002).

The United States Environmental Protection Agency has published a special document related to asthma in the schools that includes the following statements:

- Fur-bearing and warm-blooded animals including gerbils, birds, cats, dogs, mice and rats may trigger or exacerbate asthma episodes.
- Proteins which act as allergens in the dander, urine, or saliva of these warm-blooded animals may sensitize individuals and can cause allergic reactions or trigger asthma episodes. If an animal is present in the school, there is a possibility of direct, daily exposure to the animal's dander and bodily fluids.
- Even after extensive cleaning, animal allergen levels may stay in the indoor environment for several months after the animal is removed.
- The most effective method to controlling exposure to animal allergens in schools is to keep schools free of feathered or furred animals.

## Purpose of guidelines:

The purpose of having established guidelines for the presence of animals in schools is:

- 1) to decrease student exposure to potentially harmful allergens,
- 2) to inform staff regarding precautions and necessary conditions regarding animals,
- 3) to provide a basic minimum standard district-wide (individual schools could add more restrictions according to the needs of their building staff/students), and
- 4) to provide a document for communication with parents and families regarding animals in the schools.

## Guidelines development:

A committee was formed to review all locally available published guidelines and to develop recommendations for MPS guidelines regarding animals in the schools (2000). Input was received from the Minneapolis Department of Health and Family Support, and the Minnesota Department of Health. The draft guidelines were reviewed and discussed with multi-disciplinary school staff and health care providers. Reviewers included Hennepin County Community Health Department, MPS Environmental Health and Safety, and the Healthy Learner's Board's (HLB) Asthma Clinical Advisory Committee and the HLB Asthma Planning Group. Additional meetings were held with middle school and elementary science teachers, and with staff at Teacher and Instructional Services who are responsible for science curriculum development. The final draft was reviewed and approved by Allen Giles, District Legal Counsel.

These guidelines are intended as recommendations, not policy, and are based on current knowledge and studies of the relationship of animal exposure to asthma. These guidelines are not intended to mandate compliance but rather to suggest ways of handling a complex issue involving students, staff, and families.

## Additional Resources:

Several other school districts have addressed the issue of animals in the schools by developing either policies or guidelines. Rochester Public Schools has implemented a very detailed set of guidelines<sup>3</sup>. In addition to the MPS guidelines, the Rochester guidelines can be utilized by school staff in drafting more comprehensive restrictions related to individual schools.

<sup>1</sup> Pediatric Asthma: Promoting Best Practice, Guide for Managing Asthma in Children. American Academy of Allergy , Asthma & Immunology.

Prepared by the Academic Services Consortium, University of Rochester, (Rochester, New York) 1999

<sup>2</sup>Managing Asthma in the School Environment. United States Environmental Protection Agency. EPA 402-K-00-003 April 2000

<sup>3</sup>Guidelines for Having Animals in the School Setting. Health Facts. October 1999. Olmsted County Public Health Services

## Animals in the Schools: Recommendations

The following recommendations are being made concerning the presence of animals in schools. These guidelines represent a minimum standard of care. For optimal student health it is recommended that these guidelines be used to develop specific site-based guidelines for your school.

### I. Exclusions:

- Fur-bearing and warm-blooded animals, especially cats and dogs, are triggers for many students with asthma and allergies<sup>1,2,3</sup>. Therefore, guidelines recommend that cats or dogs not be allowed in any MPS school building with the exception of assistive animals such as seeing-eye dogs.
- Because other fur-bearing and warm-blooded animals also cause problems for students with asthma and other allergies, it is also recommended that no fur-bearing animals should reside for any length of time in classrooms but only visit briefly.
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### **For those schools that choose to continue to have animals residing or visiting in classrooms, the following guidelines apply:**

### II. Sanitation:

- Handwashing with soap and water is mandatory for school staff after handling animals, cage debris, or animal supplies.
- Students should never be allowed to clean up any excretory waste from the animals or handle clean cages or equipment used by animals.
- The area for cleaning cages and all animal care equipment must be maintained completely separate from any food preparation, food storage, or eating area for students.
- Staff will use a 1:10 solution of (1) bleach and (10) water for all clean up of excretory waste products and other cage cleaning. Use bleach solution only after all students are out of the room/building.
- Urine from rodents is a trigger for many students with asthma/allergies. Student exposure should be limited and then only in line with policies stated in Communication section.

### III. Indoor Air Quality

- Locate animals away from supply and return vents to avoid circulating allergens throughout the room or building.
- The areas near where the animals are housed must be kept sanitary and clean to minimize pollutants becoming airborne. Locate animal cages on hard surface floor (not on carpet).

### IV. Containment:

- Use safe and appropriate cages for all animals visiting the classroom. Animals should not be allowed to roam around either the classroom or school building; animals such as rabbits can leave droppings on the carpet.
- Teacher or classroom supervisor **MUST** be present when animals are taken out of a cage and handled by students.
- Immediately remove any animal that displays aggressive behavior.

### V. Communication:

- All parents need to be informed in advance of any animals visiting or living in their child's classroom. Many students have allergies/asthma that could be worsened by exposure to animals. If any parent objects to the presence of animals in their child's classroom, the animal must be removed from the classroom, not the student. Each building should have a plan for who will inform the parents, e.g., teacher, principal, or health office staff.

### VI. Animal Health:

- Animals must be in good health and have appropriate up-to-date immunizations and examinations by a veterinarian.
- No animals should be left residing in classrooms over release days or vacation breaks.

<sup>1</sup> Managing Asthma in the School Environment. United States Environmental Protection Agency. EPA 402-K-00-003 April 2000

<sup>2</sup> Tovey E., and Marks G. Methods and effectiveness of environmental control. Journal of Allergy and Clinical Immunology. February 1999.

<sup>3</sup> Guidelines for Having Animals in the School Setting. Health Facts. October 1999. Olmsted County Public Health Services.



## **School Bus Idling law 226 – 237 Sec 2.**

[123B.885] [DIESEL SCHOOL BUSES; OPERATION OF ENGINE; PARKING.]

Subdivision 1. [OPERATION OF ENGINE.]

All operators of diesel school buses must minimize, to the extent practical, the idling of school bus engines and exposure of children to diesel exhaust fumes.

### **Parking**

Subd. 2. [PARKING.]

On and after July 1, 2003, diesel school buses must be parked and loaded at sufficient distance from school air-intake systems to avoid diesel fumes from being drawn into the systems, unless, in the judgment of the school board, alternative locations block traffic, impair student safety, or are not cost effective.

# Sample School Board Policy to Limit School Bus Idling

R3



## **Minnesota Office of Environmental Assistance Sierra Club Air Toxics Campaign\***

- (a) **Purpose.** This policy seeks to reduce student and driver exposure to diesel exhaust particulate matter by limiting unnecessary idling of school buses pursuant to Minnesota Statute 123B.885 (Diesel school buses: operation of engine: parking).
- (b) **Applicability.** This policy applies to district-owned school buses and contracted school buses while being operated for the purpose of transporting the school district's students at public expense.
- (c) **Idling Control Measure.**
- (1) The school district shall:
    - (A) relocate school building air intake systems more than 100 feet away from school bus parking areas when practical and shall take other measures to reduce intake of school bus exhaust where relocating intake systems is not feasible, such as regulating closure of air intake vents.
  - (2) A driver of a diesel school bus:
    - (A) must turn off the bus upon reaching a school or other destination and must not turn on the engine until necessary to depart from the school or destination; and
    - (B) must park the bus at least 100 feet from a known and active school air intake system, unless the school district has determined that alternative locations block traffic, impair student safety or are not cost-effective.
  - (3) The employer of the school bus driver must ensure that:
    - (A) the bus or vehicle driver upon employment, and as necessary thereafter, is informed of the requirements of this policy and the reasons therefore.
  - (4) The employer of the school bus driver must ensure that:
    - (A) all complaints of non-compliance are reviewed and remedial action is taken as necessary.
- (d) **Exemptions.** The requirement that a driver of a diesel school bus must turn off the bus and must refrain from idling does not apply for the period or periods during which idling is necessary under the following circumstances:
- (1) **Turbo-diesel Engine Cool Down or Warm Up**
    - (A) To cool down a turbo-charged diesel engine for a period not to exceed 5 minutes before turning off the engine. (The cool down should be in accordance with the bus manufacturer's specifications); or
    - (B) To warm up a turbo-charged diesel engine for a period not to exceed 3 minutes. (The warm up should be in accordance with the bus manufacturer's specifications).
  - (2) **Cold Weather**
    - (A) If the outside temperature is between 32 degrees and -10 degrees, idling to operate heaters is allowed for up to 15 minutes; or
    - (B) If the outside temperature is below -10, there is no time restriction on idling to use heating equipment.
    - (C) In cold weather, if bus drivers will be at a location for more than 15 minutes, an indoor waiting area is encouraged.

**(3) Safety of Children and Emergencies**

- (A) Use of lift equipment during loading or unloading of children with one or more disabilities;
- (B) Use of a heater or an air conditioner of a bus during loading, unloading or transport of children with exceptional needs;
- (C) Use of defrosters, heaters, air conditioners, or other equipment for safety or health considerations;
- (D) Use of the bus headlights or four-way flasher warning lights for visibility purposes; or
- (E) For other traffic, safety, or emergency situations.
- (F) In any of the above cases, if equipment can be run from the battery then the drivers should refrain from idling, unless there is a significant concern of draining the battery.

**(4) Maintenance of Operations**

- (A) To charge a battery of a school bus, if needed; or
- (B) For testing to verify that the bus is in safe operating condition as part of the daily pre-trip vehicle inspection, or as otherwise required, including to measure vehicle emissions.

The OEA and the Sierra Club would like to thank transportation directors throughout Minnesota for assistance in developing this sample policy. December 2002  
<http://northstar.sierraclub.org/schoolbus/schools.html>

## School Idling Policy Notification

### Sample Article for Parents/School Newsletters

R4



#### Protecting Students' Health by Protecting Them from Vehicle Exhaust

In May 2002, Minnesota adopted a new state law to protect the health and safety of children at school from harmful diesel emissions. This law calls for schools to reduce the unnecessary idling of buses near the school building, and when possible reroute bus parking and loading farther away from the school's air-intake vents.

#### Why is idling of vehicles a problem?

- **Vehicle exhaust is hazardous to human health, especially children's.** Studies have linked pollution from vehicles to increased rates of cancer, heart and lung disease, asthma and allergies. Children breathe more rapidly and inhale more pollutants per pound of body weight than adults, and their lungs are still developing. A study by Yale University found that students on school buses are exposed to 5 to 15 times the levels of particulate pollution. Levels are especially high when buses idle and line up back-to-front. Idling of cars also increases the levels of pollution near schools.
- **Idling wastes resources and damages the environment.** Burning fuel needlessly costs money and contributes to air pollution problems that harm plants and animals.
- **Idling vehicles can be easily stolen or can cause damage if accidentally engaged.**
- **Today's cars and buses do not need to be warmed up, except in extremely cold conditions (below 0° F).** In fact, for modern diesel engines idling can actually be harder on the engine than driving down the road.

\_\_\_\_\_ (*Name*) \_\_\_\_\_ School (*District*) has taken the following steps to protect our students from vehicle exhaust and comply with the law:

*(Use all that apply)*

- Implemented a no-idling policy for all vehicles at every school building
- Posted "no idling" signs and alerted bus drivers, parents and administrators that engines should be turned off when a vehicle is waiting, or parked.
- Redesigned bus parking zones to move bus parking area away from school air-intake vents and park buses at a diagonal to avoid front-to-back passing of emissions.
- Required targeted maintenance of the bus fleet to reduce emissions.
- Invested in cleaner fuels and technologies, such as exhaust pipe retrofits for current buses and use of biodiesel.

Parents and guardians are essential to ensuring the protection of children's health from vehicle exhaust. We appreciate your support in following our new no idling policy when visiting our schools.

For more information on the risks of idling, contact the Sierra Club at 612-659-9124 or visit the Minnesota Office of Environmental Assistance's Web site at [www.moea.state.mn.us](http://www.moea.state.mn.us)



IDEA provides federal funds to assist stated educational agencies and, through them, local educational agencies in making special education and related services available to eligible children with disabilities. IDEA is administered by the Office of Special Education Programs (OSEP) in the Office of Special Education and Rehabilitative Services (OSERS) in the U.S. Department of Education.

A child with a disability must meet the criteria of one or more of 13 disability categories and need special education and related services. Asthma is classed as a disability under the "Health Impaired" category of IDEA, if it adversely affects a child's educational performance or interferes with learning.

IDEA requires school districts to find and identify children with disabilities and to provide them a free appropriate public education (FAPE). Under IDEA, FAPE means special education and related services that meet state standards and are provided in conformity with and individualized education program (IEP). The IDEA regulations specify how school personnel and parents, working together, develop and implement an IEP.

Each child's IEP must include the supplementary aids and services to be provided for, or on behalf of, the child and a statement of the program modifications or supports for school personnel that will be provided for the child to make progress and be involved in the general curriculum.

Generally, if a child with asthma needs only a related service and not special education services as defined by state law, that child is not a child with a disability under IDEA and therefore is not eligible for any services under IDEA. Such a child might still be eligible for services under Section 504.

## Section 504 of the Rehabilitation Act of 1973

Section 504 prohibits recipients of federal funds from discriminating against people on the basis of disability. Section 504 outlines a process for schools to use in determining whether a student has a disability and in determining what services a student with a disability needs. This evaluation process must be tailored individually, since each student is different and his or her needs will vary.

Under Section 504, students with disabilities must be given an equal opportunity to participate in academic, nonacademic, and extracurricular activities. The regulations also require school districts to identify all students with disabilities and to provide them with a free appropriate public education (FAPE). Under Section 504, FAPE is the provision of regular or special education and related aids and services designed to meet the individual educational needs of students with disabilities as adequately as the needs of non disabled students are met.

However, a student does not have to receive special education services in order to receive related aids and services under Section 504. The most common practice is to include these related aids and services as well as any needed special services in a written document, sometimes called a "Section 504 Plan".

IDEA (Individuals with Disabilities Education Act)  
Special Education Law

Regulatory	Requirements
Purpose	To insure that all children with disabilities have available to them a free appropriate public education.
Who is protected	List of 13 categories of qualifying conditions. Asthma is classed as a disability under the "Health Impaired" category of IDEA, if it adversely affects a child's educational performance or interferes with learning.
Duty to provide Free and appropriate Education	Requires the provision of a free appropriate education for students, covered including individually designed program. Requires the district to provide IEP's. "Appropriate education" means a program designed to provide "educational benefit."
Special Education VS. Regular Education	A student is eligible to receive IDEA services only if the multidisciplinary team determines that the student has one of the handicapping conditions and needs special education or related services.
Funding	If a student is eligible under IDEA, the district receives additional funding.
Accessibility	Not specifically mentioned, although if modifications must be made in order to provide a free appropriate education to a student, IDEA requires it.
General Notice	IDEA requires child find activities. Requires notification of parental rights.
Notice of Consent	A notice is required to the parent or guardian with respect to identification, evaluation and placement. Requires written notice. Notice provisions are more comprehensive and specify what the notice must provide. Written notice is required prior to any change in placement. Requires consent for initial evaluation and placement.
Evaluations	Requires consent before an initial evaluation is conducted. Re-evaluations must be conducted at least every 3 years. Does not require a re-evaluation before a significant change in placement. Provides for outside independent evaluations.
Determination of Eligibility Program and Placement	Done by admission review and dismissal (ARD) committee. Parent is an equal member of the committee.
Grievance Procedure	IDEA does not require a grievance procedure nor a compliance officer.
Due Process	To provide impartial hearings for parents or guardians who disagree with the identification, evaluation, or placement of student with disabilities. Hearings conducted by a state hearing officer (who is an attorney). Decisions may be appealed to court.
Enforcement	Compliance is monitored by the state education agency. The state education agency also receives and resolves complaints regarding IDEA. Office for Civil Rights does not enforce.



Regulatory	Requirements
Purpose	To prohibit discrimination on the basis of a disability in any program receiving federal funds
Who is protected	A student is eligible so long as he/she meets the definition of qualified handicapped person; i.e. has or has had a physical or mental impairment which substantially limits a major life activity, has a record of or is regarded as handicapped by others.
Duty to provide Free and Appropriate Education	Requires the provision of a free appropriate education for students covered including individually designed programs. "Appropriate" means an education comparable to the education provided to non-handicapped students.
Special Education VS. Regular Education	A student is eligible so long as he/she meets the definition of qualified handicapped person. i.e., has or has had a physical or mental impairment which substantially limits a major life activity, or is regarded as handicapped by others. The student is not required to need special education in order to be protected.
Funding	Additional funds are not provided for these services
Accessibility	Detailed regulations regarding building and program accessibility.
General Notice	504 requires "Child Find" activities. Districts must include notice of discrimination in its employee, parent, and student handbook, and must designate the district's 504 coordinator(s).
Notice of Consent	A notice is required to the parent or guardian with respect to identification, evaluation and placement. Requires notice. A district would be wise to give the notice in writing. Requires notice before a "significant change in placement." Consent not required, but if a handicapping condition under IDEA is suspected, those regulations must be followed.
Evaluations	Require notice, not consent. Requires periodic re-evaluations. Requires a re-evaluation before a significant change in placement. Does not provide for outside independent evaluations.
Determination of Eligibility Program and Placement	Done by a group of persons knowledgeable about the child, the evaluation data, and placement options. Parental participation is not mentioned in the regulations.
Grievance Procedure	Districts with more than 15 employees must designate an employee to be responsible for assuring district compliance with Section 504 and provide a grievance procedure (an informal hearing before a district staff member) for parent, students, and employees.
Due Process	To provide impartial hearings for parents or guardians who disagree with the identification, evaluation or placement of students with disabilities. Hearings conducted at the local level by an impartial person not connected with the school district. Person need not be an attorney. Decisions may be appealed to court
Enforcement	Enforced by the Office of Civil Rights by complaint investigation and monitoring activities

**8710.6100 SCHOOL NURSE.****Subpart 1. Scope of practice.**

A school nurse is authorized to provide to pre-kindergarten through grade 12 students nursing services in a school setting.

**Subp. 2. Requirements for first professional license.**

A candidate for licensure as a school nurse shall:

- A. hold a baccalaureate degree in nursing from a regionally accredited college or university;
- B. be currently registered in Minnesota to practice as a licensed registered nurse under the Board of Nursing;  
and
- C. be currently registered in Minnesota as a public health nurse under the Board of Nursing.

Subp. 3. [Repealed, 25 SR 805]

**Subp. 4. Professional license.**

A professional license shall be renewed according to the rules of the Board of Teaching governing professional licensure. Evidence of current Minnesota Board of Nursing registration as a licensed registered nurse is also required.

**Subp. 5. Maintaining board of nursing registration.**

In order to retain licensure as a school nurse, current registration as a registered nurse and registration as a public health nurse must be maintained at all times. Lapse of this registration or licensure is grounds for revocation of licensure as a school nurse.

Persons without baccalaureate degrees who hold valid licenses as school nurses may continue to renew their licenses under subpart 4, provided that requirements for renewal are met. However, if a license is allowed to lapse, persons must meet the licensure requirements in subpart 2 in order to receive a current school nurse license.

**Subp. 6. Effective date.**

The requirements in this part for licensure as a school nurse are effective on September 1, 2001, and thereafter.



**[School District Name]**

**[Date Created]**

*[Instructions: Bolded and italicized comments in the Model Plan must be completed according to the instructions and then removed. Some sections can be removed entirely, but the policies and practices required by the Minnesota Department of Children, Families, and Learning (CFL) (sections 2, 4-8, 10, 18, 19) should be kept in your Plan to ensure compliance with CFL's "Attachment 99 Performance Criteria" (see Appendix C). If whole sections are removed, it is prudent to provide a brief written statement justifying your actions. See the Attachments for the supporting documents, such as the guidelines and checklists that are necessary for the development of your Plan. Consult the Appendices for additional information that may help you address specific issues].*

*[The Indoor Air Quality Management Plan Development Package was developed by the Minnesota Department of Health in collaboration with the Minnesota Department of Children Families and Learning. This project was partially funded by a cooperative agreement from the United States Environmental Protection Agency, Region 5.]*

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## 1. Introduction

The health, comfort, and learning environment of students and staff are important aspects of **[school district name]** mission. Indoor air quality (IAQ) is a critical component of providing a healthy and comfortable learning environment. IAQ is important for the following reasons<sup>1</sup>.

1. Indoor air pollutants can “cause or contribute to short- and long-term health problems, including asthma, respiratory tract infection and disease, allergic reactions, headaches, nasal congestion, eye and skin irritations, coughing, sneezing, fatigue, dizziness, and nausea<sup>1</sup>”.
2. Indoor air pollutants and extremes in temperature and humidity may cause discomfort, which can affect students’ ability to concentrate and learn.
3. Indoor air quality problems can hasten building deterioration, contribute to the closing of schools, create liability problems, and strain relationships among parents, teachers, and the school administration.

**[school district name]** has implemented an IAQ Management Plan that will help monitor and improve the quality of air in school buildings. The objectives of the IAQ Management Plan are the following.

1. Reduce the levels of indoor air pollutants through preventive measures such as routine maintenance activities, periodic building evaluations and inspections, and IAQ-specific policies.
2. Provide and maintain adequate air exchanges by repairing and maintaining ventilation equipment, which will promote a comfortable and healthy learning and working environment.
3. Respond to IAQ related concerns and problems in a thorough and prompt manner, and to effectively communicate the progress of investigations and their resolution to all interested parties.

## 2. Indoor Air Quality Coordinator **[required]**

**[school district name]** has identified **[name of person]** as the Indoor Air Quality Coordinator for the district. The school administration and school board is committed to providing the necessary support to meet the school district’s IAQ Management Plan objectives.

The Indoor Air Quality Coordinator’s responsibilities include the following.

1. Acting as the key contact person within the district to respond to and address IAQ issues and concerns.
2. Acting as the lead staff person to develop and manage the district’s IAQ Management Plan, in accordance with the Department of Children, Families and Learning (CFL) requirements. This includes **[establishing an IAQ Team: optional]**, coordinating building walk-through inspections, coordinating the building systems evaluations, coordinating the investigations of reported IAQ issues and concerns, and modifying the Model IAQ Management Plan to fit the district’s specific needs and objectives.
3. Attending the CFL IAQ Coordinator Certification training workshop.
4. Responding to reported IAQ concerns and issues.
5. Communicating with staff, parents, and other parties regarding the progress made with the Plan and the process of reporting IAQ concerns.
6. Obtaining school board approval of the IAQ Management Plan after every major revision.
7. Coordinating the annual review of the Plan, which involves building walk-through inspections, building systems evaluations, and revising the Plan to include the new information obtained.
- [8. Coordination of the IAQ Team activities and meetings.]**
- [9. Distribution of the United States Environmental Protection Agency’s Indoor Air Quality Tools for Schools (TfS) Action Packet, found in the TfS kit, to IAQ Team members.]**

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<sup>1</sup> United States Environmental Protection Agency. “Indoor Air Quality Tools for Schools: Actions to Improve Indoor Air Quality”. Publication # 402-F-99-008. September 1999. Minnesota Department of Health, Indoor Air Quality Management Plan Development Package, April 12, 2002

### 3. Indoor Air Quality Team

[ *District Name* ] has established an Indoor Air Quality Team to represent [ *staff, students, and parents* ]. The IAQ Team assists the school district administration by reviewing IAQ-related information and recommending IAQ policies to maintain and improve the air quality within district facilities and school buildings.

The Indoor Air Quality Team is composed of the following individuals:

<u>Name</u>	<u>Position</u>	<u>Contact Information</u>	<u>Any Specific Duties</u>
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The IAQ Team is involved in the following efforts.

1. IAQ Team members contribute to the IAQ Management Plan creation and implementation. The IAQ Team members have reviewed the United States Environmental Protection Agency's *Indoor Air Quality Tools for Schools* (TfS) Action Packet, found in the TfS kit. The Action Packet includes a background, memo, and checklist relevant to the Team members' professional duties.
2. The IAQ Team meets regularly [ *monthly, quarterly, biannually, or other time-frame* ] to review IAQ issues.
3. The IAQ Team meets [ *annually or as needed, indicate frequency* ] to review the IAQ Management Plan, which includes the completion of walk-through inspections of school buildings, key building systems evaluations, and the review of existing policies in the IAQ Management Plan.
4. The IAQ Team meets to evaluate and respond to IAQ concerns that have been reported to the district through the IAQ concern reporting procedure outlined in the IAQ Management Plan. The Team takes steps or recommends measures to resolve the reported concern.
5. IAQ Team meeting minutes, reports and other documents are kept with the IAQ Management Plan.

### 4. Walk-Through Inspection of School Buildings [ *required* ]

[ *name of staff person(s) has or have* ] performed an IAQ walk-through inspection of the functional spaces in all the buildings that house administrative or educational operations on [ *date(s)* ]. The walk-through inspections involved observations that assessed the factors that affect indoor air quality, through the use of general human senses (sight, smell, touch, hearing). During the walk-through, all physical components that affect the air quality of functional spaces were examined, including the flooring or carpet, walls, ceiling, furniture, air intake, building entrances, mechanical rooms, and the roof. [ *include if relevant: testing equipment that was used to measure parameters such as carbon dioxide, carbon monoxide, temperature, and humidity to detect potential IAQ issues, and the guidelines used to interpret the measurements* ]. The walk-through inspections provided some insight regarding the type, location, and magnitude of apparent IAQ related issues and problems.

The "Walk-through Checklist" was used during the walk-through inspections. All observations, recommendations and comments received from students and staff during the walk-through inspection were noted on the "Walk-through Checklist". All "Walk-through Checklists" have been signed and dated by the staff performing the walk-through inspections. Copies of the checklists and associated notes are kept with the IAQ Management Plan in Attachment 2.



IAQ issues identified during the walk-through inspections were noted and addressed by **[the IAQ Team, Coordinator, or consultant]** during the development of the IAQ Management Plan. Where appropriate, potential and existing problems were investigated and resolved; this is described in the “Evaluation and Resolution of Potential Problems” section 6 of the Plan.

District staff are performing building walk-through inspections every **[time frame—at least annually]**. The walk-through inspections are documented by completing the “Walk-through Checklist”; these forms are kept with the IAQ Management Plan in Attachment 2.

## 5. Building Systems Evaluation **[required]**

**[IAQ Team needs to decide whether they will evaluate the building systems with the TfS checklists, or perform an equivalent building systems evaluation. This section must describe which of the 2 approaches has been used. If a checklist similar to the TfS checklist was developed and used, attach it to the Plan. See Attachments 1 and 3 for further information and directions.]**

### **[Option 1]:**

The **[IAQ Coordinator or Team]** has coordinated the distribution, collection, and evaluation of the TfS checklists. These checklists serve to educate staff about IAQ, and help the **[IAQ Coordinator or Team]** to obtain IAQ-related information from the district staff that are most familiar with their respective areas. The following checklists were distributed, returned, and evaluated: **[at a minimum, the “Teacher’s”, “Maintenance”, and “Ventilation” checklists, but MDH suggests that additional checklists, provided in the TfS kit, are also distributed].**

A memo accompanied the distributed checklists that identified the purpose of the checklists, and explained how to effectively fill out the checklists **[the sample memos in the TfS kit may be used]**. The checklists were not used to address individual problems; rather they use the staff’s experience and knowledge to identify and evaluate potential IAQ issues that may be associated with building system or operational failures.

The IAQ Coordinator keeps a log of the checklists, using the TfS log. **[if a different log is used, indicate here and attach the log to the Plan—TfS log is in the IAQ Coordinator Forms, TfS folder]**. During the evaluation of the checklists, obvious or likely IAQ problems were identified and the **[IAQ Team or IAQ Coordinator]** established specific policies or procedures to correct the problems. The same checklists or equivalent evaluations are completed annually to assess the district’s changing IAQ issues and concerns. The IAQ Coordinator **[or Team]** will try to recover and evaluate at least **[insert goal, such as 50 percent]** of the checklists distributed.

### **[Option 2]:**

1. **[school district name]** had **[name of consultant or staff person]** perform building systems evaluations. The evaluations examined the following areas: **[at a minimum, classrooms, ventilation system, and maintenance operations]**. The **[IAQ Team or other authority]** developed criteria to ensure that the building systems evaluations were equivalent to the TfS checklists. A description of the evaluation criteria is located in Attachment 3.

Documentation of the completed building system evaluations and findings are located in **[state location, such as Attachment 3]**. The **[consultant or IAQ Team]** was responsible for addressing problems identified, and for proposing specific policies and procedures to resolve and prevent problems. **[name of school district]** will perform building systems evaluations annually. Reports of findings and recommendations are included in the IAQ Management Plan.

When contracting building systems evaluations or other IAQ investigations with environmental consultants, the IAQ Team will review the contract to make sure it is in accordance with the work that is necessary to achieve the district's IAQ objectives.

## **6. Evaluation and Resolution of IAQ Issues [required]**

### **Walk-through Inspection and Building System Evaluations Findings:**

During the walk-through inspections and building systems evaluations, **[IAQ Team, IAQ Coordinator, or consultant's name]** identified IAQ problems and issues. The issues identified are addressed according to the plans or policies outlined in the "IAQ Issue Resolution Table" located in Attachment 6. The issues are prioritized from most important to least important. For urgent or simple issues, the proposed solutions and their outcomes are described in the table. Issues that require continual attention are described in the issue-specific policies of this IAQ Management Plan.

The district determined which IAQ issues had to be deferred. Issues are deferred if:

- they are suspected to take more than **[three months]** to resolve;
- they are "big ticket" item(s) that require re-appropriation of money; or
- time restraints limit the district's ability to respond promptly.

The deferred maintenance issues are described in the "Deferred Maintenance Table" located in Attachment 6. Issues are organized by priority and by who does the work (district staff or a contracted service provider). The district administration expects to complete the necessary maintenance, renovations, and construction by the date indicated.

### **Resolving Problems reported to the IAQ Coordinator:**

Problems are reported to the IAQ Coordinator through the IAQ Concern Reporting Form, located in Attachment 5. The IAQ Coordinator documents all IAQ concerns, performs an initial investigation, and documents and communicates the resolution to all interested parties. All concerns are investigated and documented, reflecting the district's commitment to addressing all IAQ related concerns.

The IAQ Coordinator **[or Team]** uses the IAQ Concern Reporting Form and **[pick your tools, such as the TFS "Problem Solving Wheel", "Problem Solving Checklist", and sections 10-13 of the TFS IAQ Coordinator's Guide]** to help identify IAQ problems. If the problem cannot be identified, or persists despite the district's efforts to identify and remediate it, the IAQ Coordinator discusses the matter with the appropriate school official(s) in order to determine whether a contracted service provider is needed.

When the problem is successfully identified, the IAQ Coordinator decides whether an immediate response is necessary, communicates with the relevant parties, documents the action taken, and keeps copies of the documents in Attachment 5. When the problem is not urgent but requires a policy change, the IAQ Coordinator organizes a meeting with the **[IAQ Team or a Committee]** to develop and recommend specific policy changes. These policy changes are presented to the appropriate school officials for review and adoption. All new or revised policies are added to the existing IAQ Management Plan. All interested parties are informed about the measures taken to resolve the problem and of any policy changes.

## 7. Communication Policy *[required]*

Communication is a critical element to successfully manage IAQ issues. The IAQ Coordinator and other district authorities try to limit misinformation and confusion through the use of effective communication. The IAQ Coordinator and other district employees communicate with relevant parties in a prompt, courteous, and consistent manner until the issue is resolved to the greatest extent possible. It is the goal of **[name of school district]** to develop and maintain the trust of the community and staff.

Every time a concern is addressed or resolved, the IAQ Coordinator reports the measures taken and the resolution of the identified concern to the appropriate parties. This will ensure that all interested parties know what action(s) have been taken.

In addition, the IAQ Team and Coordinator will inform parents and staff about the following.

1. The IAQ Management Plan, how to view the Plan upon request, and how to obtain an IAQ Concern Reporting Form.
2. How to contact the IAQ Coordinator about IAQ issues and learn:
  - a. where to find self-help information to evaluate IAQ in the home; and
  - b. how to obtain information about the structural features and operational practices of the school buildings; and
  - c. how to obtain information on what parents can do to address IAQ issues that cannot be resolved through the concern reporting process. **[see Appendix E for resources to answer questions]**.

**[name of school district]** announces this information and the availability of resources to parents and staff using **[name the media used (such as the school newsletter, “Right-to-Know” notification, a specific letter, or some other way) and time of year (usually the beginning)]**.

In the unlikely event of an IAQ emergency, the district will accommodate the needs of students, parents, and staff. The media will be alerted when it is necessary to provide information to a broader audience. Every effort will be made to share appropriate information as soon as it becomes available to the school district.

## 8. IAQ Concern Reporting and Response Policy *[required]*

The **[name of school district]** encourages the reporting of IAQ concerns, regardless of how trivial the issue may seem. The prompt reporting and resolution of IAQ issues has the potential to prevent serious problems from developing, which should prevent potential health effects, discomfort, and unnecessary costs. This makes the investigation of all reported concerns worthwhile.

The IAQ Coordinator **[may or will require]** the concerned staff, students, and parents to report their IAQ concern in writing. A written description of the concern should reduce misunderstanding and create a history that can be referred to at a future date. The “IAQ Concern Reporting Form”, located in Attachment 5, has been made available to district staff and parents. This form should be completed and sent to the IAQ Coordinator to initiate an official IAQ concern reporting process. The IAQ Coordinator investigates the concern using **[state what is used, such as the TFS documents]** and the “IAQ Concern Reporting Form”. The resolution of the issue will be documented and the interested parties will be informed in writing about the measures taken. IAQ Concern Reports and associated documents are located in **[state location, such as Attachment 5]**. Information collected is processed and stored according to the school district’s data practices policies.

## 9. Emergency Response Policy

Emergencies are defined as situations that require immediate action. This includes situations that are potentially life threatening, such as:

- complaints of headaches, nausea, and combustion odors;
- diagnosed Legionnaire's disease or tuberculosis; and
- spills of hazardous materials.

In addition, emergencies include situations where there is limited time available to prevent serious property damage or health problems, such as flooding in a carpeted area.

It is up to the discretion of the school administrators to determine emergencies on a case-by-case basis, using the above definition as a general guideline only. If doubt exists about whether exposure to a specific hazard constitutes an emergency, a precautionary approach may be used where the matter is handled as an emergency. Non-emergency situations are addressed according to the "Concern Reporting and Response Policy", section 8.

District officials will respond to emergencies immediately. If the problem cannot be resolved with in-house resources, external help will be requested. If a hazard poses an immediate health threat to the students and staff, the affected building areas will be evacuated. All avenues of communication will be utilized to warn and inform interested parties in a prompt manner (see Communication Policy, section 7).

## 10. Preventive Maintenance and Operations Policy **[required]**

Preventive maintenance means the routine inspection, adjustment, and repair of building structures and systems, including the heating, ventilating, and air conditioning system (HVAC), unit ventilators, local exhaust, fresh air intakes, and flooring. Preventive maintenance plays a major role in maintaining the quality of air, by assuring that the building systems are operating effectively and efficiently. Moreover, it helps to maintain a comfortable temperature and humidity in occupied spaces.

**[school district name]** preventive maintenance schedule is located in Attachment 4. It describes the schedule and location of building and ventilation components that are inspected and maintained on a routine basis. The schedule was established using the past experience of school district maintenance professionals, the availability of financial resources, and technical guides, including the manufacturer's specifications. The person performing the preventive maintenance follows the checklist strictly, and the **[IAQ Coordinator or appropriate staff person]** monitors its completion. All records of preventive maintenance are kept in **[the IAQ Management Plan Attachment 4 or attached to the operating system for easy evaluation]**.

To the extent possible, school officials try to maintain the school buildings according to the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) recommended comfort parameters described in standards 55-1992 and 66-1999. If the parameters cannot be met, the district staff makes ventilation adjustments that provide a fresh air delivery, temperature, and humidity level that are as close to the ASHRAE parameters as possible.

**[Use CFL's "Indoor Air Quality Operations and Maintenance Manual", located in Appendix F, as a resource]**

## 11. Construction and Renovation Policy

The **[school district name]** considers indoor air quality when planning construction and renovation projects. The IAQ Coordinator, **[IAQ Team]**, superintendent and school board discuss major structural changes that may impact IAQ. The findings from the walk-through inspections and building systems evaluations were considered when planning renovations. These plans are summarized in the "IAQ Issue Resolution Table" and "Deferred Maintenance Table" located in Attachment 6.

To the extent possible, major renovations are performed when school is not in session. If renovation projects must be

performed while school is in session, the return air from any area being renovated is isolated from the main ventilation system. Engineering controls are used to contain and minimize the distribution of dust and other contaminants produced by construction activities. Cleaning operations are more frequent during and after renovation.

***[The Minneapolis Public Schools “Acceptable Indoor Air Quality for School Construction Projects”, located in Appendix G, may be used to address specific issues that emerge, if they aren’t covered by this policy]***

## **12. Microbial Management Policy**

Microbials, such as fungi (for example, mold), bacteria, and viruses, are a significant cause of illness, health symptoms, and discomfort. Because the easiest way to control microbial growth is to control moisture, school staff emphasizes moisture control to manage microbial growth.

***[name of school district]*** officials paid close attention to water intrusion and microbial growth during the walk-through inspections, buildings systems evaluations, and other efforts. The maintenance staff has been informed about identifying damaged buildings systems and components that cause water leaks and water condensation. School staff is expected to make the necessary repairs and adjustments in a prompt manner. Materials damaged by water are replaced when possible. Materials that cannot be replaced and must be kept (this could include carpets, padding, ceiling tiles, sheet rock, and insulation) are dried, preferably within 24 hours, but no later than 48 hours.

Materials contaminated with microbials are promptly cleaned or replaced. Mold growth is removed from non-porous surfaces with a strong brush and non-ammonia containing detergent, ***[followed by application of diluted bleach (optional)]***, and then by thorough drying. ***[MDH’s “Best Practices for Mold Investigation in Minnesota Schools” is used as a guideline for addressing microbial growth (see Appendix D)]***. Remediation projects that cannot be handled by district staff are contracted to a professional. Large-scale remediation projects follow the guidelines in the “Construction and Renovation Policy” section 10, and additional control and protection measures may be necessary.

## **13. Animals in School Buildings Policy**

Since animals can be a source of allergens, asthma triggers, and microorganisms that can cause infectious diseases, ***[school district name]*** has instituted an animal policy. Information gathered from walk-through inspections, building systems evaluations, IAQ concern reports, and staff meetings has been used to create this policy.

Animals should be kept in an appropriate habitat when they are not being used for education. They should be kept away from carpeted areas in order to minimize the transfer of allergens to the carpets, and the possibility of soiling the carpets.

Specific types of animals will be restricted if a concern is expressed by staff, students or parents. The district reserves the right to ban certain animals if they pose a threat to the safety or comfort of staff and students.

## 14. Cleaning and Chemicals Policy

Regular and thorough cleaning is an important means for the removal of air pollutant sources, however the use of cleaning products may also contribute to indoor air pollution. To ensure that cleaning practices remove pollutant sources while using cleaning products appropriately, cleaning guidelines have been created. **[consider the following guidelines]:**

- Custodial staff is instructed to only use cleaning agents approved by the district for school use. The bottles are clearly labeled, and stored in a secure area. Bottles of cleaning agents must be closed tight when stored.
- All material safety data sheets are stored in an area available to all staff, and the location of this information is discussed in the district's "Employee Right to Know" annual training.
- Building rooms are maintained at reasonable cleanliness. Slightly damp cloths are used to remove dust from surfaces—however, wiped surfaces should not be left damp or wet for extended periods of time, since this can cause mold growth.
- Ammonia based cleaning agents and chlorine-containing cleaners (such as bleach) are never to be mixed because this generates toxic gases.
- During routine operations, pollutant-releasing activities are restricted by time of day, week, or year. For example, the waxing of floors will be performed **[on Friday afternoons or vacations, to ensure that most gases are removed by the time classes resume]**. If pollutant-releasing procedures must be performed during school session, the minimum amount of chemical and local exhaust is used when available.
- Areas of frequent use are cleaned more often than areas of infrequent use.
- Large walk-off mats are used to trap dirt and moisture at building entrances. These mats are cleaned according to manufacturers' guidelines to ensure optimal performance. Trapping dirt and moisture at building entrances helps to maintain the cleanliness of floors and carpets throughout the building.

## 15. Flooring and Furnishing Policy

Flooring can be a trap for allergens, and can be a source of potentially hazardous gases called "volatile organic compounds", especially following installation. Carpets can be more difficult to properly maintain than hard flooring, and as a result carpets may accumulate more pollutants. When performing building systems evaluations, walk-through inspections, and reviewing concern reports, the possibility of the carpet acting as the primary source of pollutant is considered. If a persistent problem is associated with carpeting, it is replaced with hard flooring, unless there is a compelling reason to install a new carpet.

**[Carpets will be phased out in certain parts of school buildings. Heavy traffic areas, building entrances, science laboratories, bathrooms, art rooms, and shop rooms will not have carpeting, and hard flooring will replace any existing carpets.]**

**Furniture can also be a source of volatile organic compounds and trap allergens. Staff is not allowed to bring personal furniture to school. The school district approves and purchases furniture that is used on school property.]**

All carpets are cleaned with hot water extraction at a minimum of **[frequency]** a year. Carpeting is not cleaned during summer months unless the carpet can be dried within 24 hours.

## 16. Other IAQ-Related Environmental Policies

The **[school district name]** has established the following environmental policies and programs to help improve and



maintain the quality of air within our schools.

**[the following is an alphabetical list of possible plans and approaches to addressing other major indoor air hazards; edit according to the reality of the school district's existing plans and efforts]**

### **Asbestos Hazard Emergency Response Act (AHERA) Management Plan**

The AHERA Management Plan reduces the likelihood of the district staff's exposure to asbestos during general operation and maintenance activities. It describes the location and condition of asbestos containing building materials, and their

removal and repairs if necessitated by AHERA. The AHERA Management Plan also describes the proper record keeping practices that school officials follow. The AHERA Management Plan is located in **[state the location]**.

### **Integrated Pest Management Program**

Integrated Pest Management (IPM) is an important strategy for maintaining good IAQ because both pest generated substances (such as cockroach fecal matter) and pesticides can act as irritants and trigger allergies and asthma. The district's IPM program should reduce the frequency and magnitude of both pesticide use and pest problems. The school district's IPM file is located in **[state the location]**.

### **Lead**

Lead can affect the nervous system, and young children are particularly susceptible. If lead is present in existing school building paint coatings, renovation procedures will be employed that minimize the exposure of building occupants to airborne lead-based paint particles. In addition, a "Lead in Water Plan" has been implemented that includes water sampling, replacing faucets, education, and record keeping. This plan is located in **[state the location]**

### **Radon Gas**

Radon is a naturally occurring gas that can enter into school buildings from the underlying soils, and build-up to levels that increase occupants' risk for developing lung cancer. Radon testing and mitigation has been performed in **[state areas that apply]**. Radon levels were found to be at **[state level, usually picocuries per liter (pCi/L)]**. All radon levels that exceeded **[state level, usually 4 pCi/L]** have been reduced to levels comparable to the outside air. Information on the radon testing and mitigation is located in **[state the location]**.

### **Tobacco Ban**

The Minnesota Clean Indoor Air Act prohibits tobacco use in all public school facilities and vehicles. Information about the law and the school district's implementation of the law is located in **[state the location]**. This prohibition does not apply to the lighting of tobacco by an adult as a part of a traditional Indian spiritual or cultural ceremony.

## **17. Education of Staff Policy**

All district employees play an important role in maintaining and improving air quality since their behavior can affect the quality of the air present in school buildings. For example, placing heavy objects on unit ventilators, adjusting the room thermostats, or turning off noisy unit ventilators can worsen the quality of air in a room. An educated employee is more likely to take steps that maintain good air quality. In addition, an employee with an understanding of IAQ is more likely to report IAQ concerns quickly and accurately. For these reasons, the district staff is educated about IAQ.

**[school district name]** performs an annual IAQ training session, as part of the **[name of training program, such as health and safety, employee right to know]**. The **[IAQ Coordinator or other qualified person]** performs the training. The training **[complete according to training agenda: for example, describing the importance of IAQ to health and learning, and the behavioral and building characteristics that are associated with poor IAQ]**.

**[If TfS checklists are used, include the following:**

The TfS checklists distributed annually are also educational tools. The staff is encouraged to complete the following checklists **[include the distributed checklists and include at least the teachers, ventilation, and building maintenance checklists]**.

## **18. Documentation of School Board Approval [required]**

The **[school district name]** school board approved the district IAQ Management Plan on **[insert date] [with or without]** exception **[if exceptions were noted, state them here]**. School board approval is sought after every major change to the Plan, or every year, whichever ever comes first. Minutes from the school board meeting indicating IAQ Management Plan approval are kept with this plan. A copy of the meeting minutes can be found in **[name location, for example Attachment 7]**.

## **19. Annual Review [required]**

**[school district name]** performs an annual review in order to make changes to the IAQ Management Plan. The annual review is necessary because changes may occur in the building systems, components, occupants, and the administration's attitudes and priorities.

The annual review involves:

- building systems evaluations;
- walk-through inspections;
- reviewing IAQ Concern Reports and other information;
- discussing new issues with the IAQ Team; and
- changing the IAQ Management Plan as needed.

A brief description of the changes to the Plan is written and included in all future versions of the Plan. This creates a history of IAQ that should reduce the likelihood of repeating policies and procedures that were ineffective or inefficient.

**121A.22 Administration of drugs and medicine.**

Subdivision 1 **Applicability.** This section applies only:

1. When the parent of a pupil requests school personnel to administer drugs or medicine to the pupil; or
2. When administration is allowed by the individual education plan of a child with a disability.

The request of a parent may be oral or in writing. An oral request must be reduced to writing within two school days, provided that the district may rely on an oral request until a written request is received.

Subd. 2. **Exclusions.** In addition, this section does not apply to drugs or medicine:

1. That can be purchased without a prescription;
2. That are used by a pupil who is 18 years old or older;
3. That are used in connection with services for which a minor may give effective consent, including section [144.343](#), subdivision 1, and any other law;
4. That are used in situations in which, in the judgment of the school personnel who are present or available, the risk to the pupil's life or health is of such a nature that drugs or medicine should be given without delay;
5. That are used off the school grounds;
6. That are used in connection with athletics or extra curricular activities;
7. That are used in connection with activities that occur before or after the regular school day;
8. That are provided or administered by a public health agency in order to prevent or control an illness or a disease outbreak as provided for in sections [144.05](#) and [144.12](#); or
9. That are prescription asthma or reactive airway disease medications self-administered by a pupil with an asthma inhaler if the district has received a written authorization from the pupil's parent permitting the pupil to self-administer the medication, the inhaler is properly labeled for that student, and the parent has not requested school personnel to administer the medication to the pupil. The parent must submit written authorization for the pupil to self-administer the medication each school year.

Subd. 3. **Labeling.**

Drugs or medicine subject to this section must be in a container with a label prepared by a pharmacist according to section [151.212](#) and applicable rules.

Subd. 4. **Administration.**

Drugs and medicine subject to this section must be administered in a manner consistent with instructions on the label. Drugs and medicine subject to this section must be administered, to the extent possible, according to school board procedures that must be developed in consultation:

1. With a school nurse, in a district that employs a school nurse;
2. With a licensed school nurse, in a district that employs a licensed school nurse;
3. With a public or private health or health-related organization, in a district that contracts with a public or private health or health-related organization, according to section [121A.21](#); or
4. With the appropriate party, in a district that has an arrangement approved by the commissioner of education, according to section [121A.21](#).

Subd. 5. **Children with a disability.**

For drugs or medicine used by children with a disability, administration may be as provided in the individual education plan.

Subd. 6. **Health treatments.**

For the purpose of this section, special health treatments and health functions, such as catheterization, tracheostomy suctioning, and gastrostomy feedings, do not constitute administration of drugs or medicine.



### **121A.221 Possession and use of asthma inhalers by asthmatic students.**

- A. In a school district that employs a school nurse or provides school nursing services under another arrangement, the school nurse or other appropriate party must assess the student's knowledge and skills to safely possess and use an asthma inhaler in a school setting and enter into the student's school health record a plan to implement safe possession and use of asthma inhalers.
  
- B. In a school that does not have a school nurse or school nursing services, the student's parent or guardian must submit written verification from the prescribing professional that documents an assessment of the student's knowledge and skills to safely possess and use an asthma inhaler in a school setting has been completed.

**121A.21 School health services.**

- A. Every school board must provide services to promote the health of its pupils.
  
- B. The board of a district with 1,000 pupils or more in average daily membership in early childhood family education, preschool handicapped, elementary, and secondary programs must comply with the requirements of this paragraph. It may use one or a combination of the following methods:
  - 1. Employ personnel, including at least one full-time equivalent licensed school nurse;
  - 2. Contract with a public or private health organization or another public agency for personnel during the regular school year, determined appropriate by the board, who are currently licensed under chapter 148 and who are certified public health nurses; or
  - 3. Enter into another arrangement approved by the commissioner.