

*Department of Health
Nursing Care Quality Assurance Commission*

Advisory Opinion

The Nursing Care Quality Assurance Commission (NCQAC) issues this advisory opinion in accordance with [WAC 246-840](#). An advisory opinion adopted by the NCQAC is an official opinion about safe nursing practice. The opinion is not legally binding and does not have the force and effect of a duly promulgated regulation or a declaratory ruling by the NCQAC. Institutional policies may restrict practice further in their setting and/or require additional expectations to assure the safety of their patient and/or decrease risk.

<i>Title:</i>	Camp Nursing	<i>Number:</i> NCAO 2.10
<i>References:</i>	RCW 18.79 Nursing Care WAC 246-840 Practical and Registered Nursing Interactive Scope of Practice Decision Tree	
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<i>Supersedes:</i>	Camp Nursing Advisory Opinion (September 13, 2013) Medical Personnel at Nurse Camps (February 19, 1999)	
<i>Approved By:</i>	Nursing Care Quality Assurance Commission (NCQAC)	

Conclusion Statement

The appropriately prepared and competent registered nurse (RN) may practice nursing independently in camp settings up to their lawful and individual scope of practice and nursing practice standards or carry out medical regimens under the direction of an [authorized health care practitioner](#). The appropriately prepared licensed practical nurse (LPN) may provide nursing care in camp settings up to their lawful and individual scope of practice and nursing practice standards under the direction of an [authorized health care practitioner](#) or under the direction and supervision of the RN. Refer to the [Registered Nurse and Licensed Practical Nurse Scope of Practice Advisory Opinion](#) for more information. Laws and rules apply to nursing care in the camp setting whether the nurse is in a paid or volunteer position. The nurse is always responsible to adhere to the legal scope of practice standards in any practice role. The Nursing Care Quality Assurance Commission (NCQAC) recommends the nurse use the [Interactive Scope of Practice Decision Tree](#) to determine if an activity is within the nurse's individual scope of practice. This advisory opinion does not address state or federal proclamations or rule waivers issued that temporarily change some regulatory requirements in emergency or disaster situations.

Background and Analysis

Washington state regulations related to recreational camps ([Chapter 246-376 WAC](#)) focus on environmental health and do not include health care requirements. The Washington state nursing laws and rules do not address camp nursing. Nursing care in camps can be challenging. The nurse may be the only health care professional on site to address health care and safety needs of campers and staff. Examples of types of camps include private, faith-based, special needs, sports, and not-for-profit camps. Camp settings may be in remote areas with limited access to health care services. Camps may have activities that increase risk for injury or illness such as hiking, rock climbing, contact sports and water sports. Environmental factors may also play a role, such as exposure to inclement weather, disasters such as forest fires, allergens, rodents, insects, wild animals, and dormitory-style living.

The nurse must be licensed in Washington state with some exceptions:

- The RN or LPN who is licensed and in good standing in another U.S. jurisdiction and the camp is run/administered by an institution or agency of the Federal or Tribal government. [RCW 18.79.240](#).
- The RN or LPN who is licensed and in good standing in another U.S. jurisdiction without compensation for no more than thirty (30) days in a calendar year. [RCW 43.70.117](#). See the [Healthcare Professional Volunteers: Washington State Department of Health](#) website for more information.
- The RN or LPN who is licensed and in good standing in another U.S. jurisdiction may accompany and care for a patient not to exceed six (6) months on a one-time basis. The nurse may not hold themselves out as a nurse. [RCW 18.79.240](#).

Recommendations

The NCQAC recommends following the Association of Camp Nurses (ACN) guidelines in compliance with applicable state and federal laws and rules:

[Documentation Practice Guideline](#)

[Health Screening Practice Guideline](#)

[Medication Management Practice Guideline](#)

[Communicable Disease Management in the Camp Setting Practice Guideline](#)

[Communicable Disease Management Strategies for Camp](#)

Nurse Competency

Basic competencies for camp nurses include the knowledge, skill, and ability to perform the following activities within their individual scope of practice:

- Adapt nursing care to the camp setting.
- Develop or assist in developing individualized nursing care plans using the nursing process based on the general and specialized health care needs of the campers.
- Communicate with health care providers, parents, campers, and staff.
- Provide training/education to other health care providers, parents, campers, and staff.
- Coordinate health activities with routine camp activities.
- Provide nursing care for common health problems found in camp settings for healthy individuals and those with common chronic health conditions such as diabetes, asthma, allergies, seizures, behavioral or emotional disorders.
- Provide first aid and emergency care and ability to prepare for natural or manmade disasters.

- Plan and provide health promotion and illness prevention activities in the camp setting.
- Follow infection control practices, communicable disease control practices, mandatory reporting practices and safety practices in the camp setting.
- Recognize and provide nursing care specific to age, growth and development, socioeconomic background, health status, geographical location, physical location, daily schedule, risk profile and other factors to determine health risks to campers and staff.
- Maintain confidentiality of protected health information (PHI).

Health and Wellness

A health history and nursing assessment is fundamental to determining the health care needs of campers or staff. Written consent is required for treatment from parent(s) or legal guardian for children under 18 years of age and applies to campers and staff. Consent for treatment is recommended for staff 18 years and older. Authorization for medical treatment should be in writing from the camper's health care provider. A nurse can give medical care in an emergency without written consent. The nurse should be actively involved in safety, emergency preparedness and infection control and illness prevention strategies. Activities should include immunization and health history review of campers and staff identifying at-risk individuals. Staff orientation should include injury and illness prevention, infection control, and other preventive strategies (such as use of helmets or other protective equipment) relevant to the camp setting. The nurse should perform monitoring and surveillance activities.

Nursing Process, Care Planning and Care Coordination

The RN, when developing the individualized nursing care plan, should consider the medical history, restrictions, increased risk for communicable diseases, limitations, special needs, medications, emergency care plan, chronic illness care, level of self-management and advance directives. This may include training for parents, camp staff, campers, and other health care providers as necessary to plan and coordinate the care needed.

Standing Orders

Standing orders provide care directives approved by an authorized health care practitioner may be used to carry out nursing and medical orders. See the [Standing Orders Advisory Opinion](#) for more information. [RCW 18.79.240](#) allows the RN and LPN to provide nursing assistance in cases of emergency.

Medication Management

The RN or LPN may not prescribe (interpret a prescription for a legend drug or select, measure, compound, label or package) a legend drug or controlled substance. [RCW 69.41.010](#). The nurse may administer medications from an appropriately labeled, pre-packaged container with a valid order and prepare medication organizers using medications from pharmacy prepared containers. ([RCW 18.79.040](#), [RCW 18.79.060](#), [69.41.050](#)).

Pharmacy prepared bubble packing is recommended for routine medications. The nurse must have written consent from the parent or legal guardian to give legend and over-the-counter drugs to children under 18 years old or for someone who is not competent, except in an emergency. [RCW 7.70.065](#).

Authorization to give legend drugs, over-the-counter drugs, herbals, supplements, or other

homeopathic remedies should be in writing from the camper's health care provider and the camper's parent or legal guardian. Medications should be stored and secured appropriately. Medications should not be stored with food. Medications should be maintained at proper temperature and internal medications (oral, injectable) and external medications (topical, eye, ear and rectal) distinctly separated. Controlled substances should be kept locked in a secure manner except during administration with accountability processes in place. The nurse should consider privacy issues when giving medications. In the camp setting, unless the camp is an extension of a state-approved school, a nurse may not delegate administration of medications or other nursing care tasks to unlicensed assistive personnel (UAP).

Nursing Delegation

Camps may employ credentialed or non-credentialed unlicensed assistive personnel (UAP) staff to help deliver health care. Examples of credentialed UAP include the nursing assistant-registered/nursing assistant-certified (NA-R/NA-C) and the medical assistant-registered and medical assistant-certified (MA-R/MA-C). The laws and rules vary as to who can delegate, what tasks can be delegated, and who the nurse can delegate to is defined by setting and credential. The delegating nurse needs to be knowledgeable and understand the laws and rules related to nursing delegation based on the credential.

Nursing Assistant-Registered/Nursing Assistant-Certified (NA-R/NA-C) Delegation

In the camp setting, the RN may delegate routine and non-complex tasks to the NA-R/NA-C following the delegation process. The LPN may delegate to the NA-R/NA-C under the direction and supervision of the RN. The nurse may not delegate any activity that requires nursing judgment, medication administration, or any activity that pierces the skin.

Medical Assistant-Registered/Medical Assistant-Certified (MA-R/MA-C) Delegation

In the camp setting, the RN may delegate routine and non-complex tasks to the MA-R/MA-C following the MA laws and rules. The RN must be on the premises when the MA-R/MA-C provide care. It is not within the scope of the LPN to delegate tasks to the MA-R/MA-C in any setting.

Non-Credentialed UAP

In general, the RN or LPN may not delegate to non-credentialed UAP in a camp setting. An exception exists in camps sponsored kindergarten-twelve (K-12), public or private school, settings (See below).

Kindergarten-Twelve (K-12), Public or Private School Sponsored Camps

The school RN may delegate nursing tasks to non-credentialed UAP in K-12, public or private school-sponsored camps. See the [Registered Nurse Delegation in School Settings: Kindergarten-Twelve \(K-12\) Grades, Public and Private Schools Advisory Opinion](#) for more information.

Camp Type	NA-R/NA-C	MA-R/MA-C	Non-credentialed UAP
School-Sponsored Camp (K-12)	<ul style="list-style-type: none"> RN delegation allowed within the NA-R/NA-C scope of practice. <p>*Delegation of medication administration, tasks that require nursing judgment or tasks that include penetrating the skin is not permitted.</p>	<ul style="list-style-type: none"> RN delegation allowed within the MA-R/MA-C scope of practice. RN must be on the premises. 	<ul style="list-style-type: none"> RN delegation allowed. See the Registered Nurse Delegation in School Settings: Kindergarten-Twelve (K-12) Grades, Public and Private Schools Advisory Opinion
Non-School Sponsored Camp	<ul style="list-style-type: none"> RN delegation allowed within the NA-R/NA-C scope of practice LPN delegation allowed under the direction and supervision of the RN. <p>*Delegation of medication administration, tasks that require nursing judgment, or tasks that include penetrating the skin is not permitted.</p>	<ul style="list-style-type: none"> RN allowed to delegate within the MA-R/MA-C scope of practice. RN must be on the premises. 	<ul style="list-style-type: none"> Nursing delegation is not allowed. The parent/legal guardian must give permission for UAP to provide care (<i>in loco parentis</i> – “in place of the parent”). RN may provide education/training, consultation, and guidance to UAP. LPN may provide education, training, and guidance to UAP under the direction and supervision of the RN or under the direction of an authorized health care practitioner.

Note: the NA-R/NA-C or MA-R/MA-C may work at a camp as a non-credentialed UAP, and if so, may not identify themselves with the credential.

Communication and Documentation

The NCQAC recommends the nurse follow the guidelines in the Association of Camp Nurses (ACN) [Guidelines for Documentation in Day and Resident Camps](#). The nurse must follow the Washington State Labor and Industry procedures to document and report work-related injuries. Other commonly used documentation methods include medication and supply inventory tracking systems, surveillance tools, injury and illness reporting systems. Based on national standards and Washington State hospital medical record retention requirements ([RCW 70.41.190](#)), the NCQAC recommends camp nurses:

- Retain and preserve health care records for campers and staff 18 years and older for at least ten years following the most recent care episode,
- Retain and preserve health care records for campers and staff under 18 years old for at least three years after turning 19 years old or ten years after the most recent care episode,

Retention and preservation is required for at least one year after receiving or processing an authorization to release information. [RCW 70.02.160](#)

Privacy and Confidentiality of Protected Health Information (PHI)

The nurse must maintain and secure medical records in compliance with state laws, RCW 70.02, and the [Health Care Affordability and Accountability Act \(HIPAA\)](#) and typically cannot release any PHI without written authorization from the patient, parent or legal guardian except on a need-to-know basis with another health care practitioner. If the camp is associated with the K-12 Public or Private Schools, then the [Family Educational Rights and Privacy Act \(FERPA\)](#) law applies. Other exceptions include mandatory reporting of notifiable conditions, WAC 246-101 and suspected abuse or neglect of children or vulnerable adults. RCW 26.55.030.

Licensure and Certification

Nurses must have an active Washington State nursing license. [RCW 18.79.030](#). Nurses accompanying campers to another state need to check with that state to determine if they need a nursing license from that state. Nurses licensed in another state may provide care for a patient temporarily in Washington for up to six months without an in-state license. While there is no requirement for a certification as a camp nurse, the camp may require a specific training course or professional certification in camp nursing or other specialty areas. [RCW 43.70.117](#) allows nurses licensed in another state to provide volunteer nursing care without a Washington State nursing license. See the Washington State Department of Health [Healthcare Professional Volunteers](#) webpage.

The NCQAC does not have authority to require professional liability insurance, establish working hours, on-call status, compensation, assignment, camper-nurse ratios or other employer-employee issues. Camps, as employers, can define the employees' jobs more narrowly than the full scope of practice allowed by law.

Common Roles and Responsibilities of Camp Nurses	
Registered Nurse	Licensed Practical Nurse
<ul style="list-style-type: none"> ▪ Provide routine and complex nursing care. ▪ Carry out medical regimens under the direction of an authorized provider including administration of over-the-counter drugs, herbals, supplements, homeopathic remedies and legend drugs or controlled substances. ▪ Monitor campers with chronic conditions, special needs, and complex medical treatments. ▪ Prevent, monitor, and respond to communicable disease outbreaks. ▪ Maintain infection control and safety standards. ▪ Perform emergency preparedness activities. ▪ Observe and report suspected child or vulnerable adult abuse or neglect. ▪ Store and secure medications. ▪ Perform quality control activities of medical devices such as glucometers. ▪ Perform inventory management activities. ▪ Provide first aid, cardiopulmonary resuscitation (CPR) and emergency care. ▪ Develop individualized nursing care plans. ▪ Communicate with other health care professionals, parents, and camp staff as appropriate and to develop individualized health care plans. ▪ Provide routine or complex health promotion and preventive activities for campers and staff. ▪ Coordinate care with camp staff. ▪ Maintain confidentiality of protected health information (PHI) following federal and state Health Information Portability and Accountability (HIPAA) laws and rules. ▪ Document care using the nursing process. 	<ul style="list-style-type: none"> ▪ Provide routine nursing care. ▪ Carry out medical regimens under the direction and supervision of an authorized provider including administration of over-the-counter drugs, herbals, supplements, homeopathic remedies and legend drugs or controlled substances. ▪ Monitor campers with chronic conditions, special needs, and routine medical treatments. ▪ Prevent, monitor, and respond to communicable disease outbreaks. ▪ Maintain infection control and safety standards. ▪ Perform emergency preparedness activities. ▪ Observe and report suspected child or vulnerable adult abuse or neglect. ▪ Store and secure medications. ▪ Perform quality control activities of medical devices such as glucometers. ▪ Perform inventory management activities. ▪ Provide first aid, CPR, and emergency care. ▪ Assist the RN to develop individualized nursing care plans. ▪ Communicate with other health care professionals, parents, and camp staff as appropriate and to develop individualized health care plans. ▪ Provide routine health information and promotion activities for campers and staff. ▪ Coordinate care with camp staff. ▪ Maintain confidentiality of PHI following federal and state HIPAA laws and rules. ▪ Document care using the nursing process.

Conclusion

Camp nurses are responsible and accountable for giving safe, effective, and ethical care that follows federal and state laws and rules. The care they provide must be consistent with their knowledge, skills, critical thinking, and judgment to address campers’ health care needs and to manage routine, complex and emergency situations. The nurse is responsible for the laws and rules and functioning within the legal scope of practice.

References

[RCW 69.41 Legend Drugs - Prescription Drugs](#)

[RCW 69.50 Uniform Controlled Substances Act](#)

[Chapter 246-376 WAC:](#)

[WAC 246-101 Notifiable Conditions](#)

[WAC 70.02 Medical Records](#)

[WAC 7.70.065 Informed Consent](#)

[WAC 296-126 Standards of Labor for the Protection of the Safety, Health, and Welfare of Employees for All Occupations Subject to Chapter](#)

[Improving Health and Safety at Camp | American Academy of Pediatrics \(aapublications.org\)](#)

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