



**Washington State Board of Nursing (WABON)  
Consistent Standards of Practice Sub Committee  
April 2, 2024 12 p.m. to 1 p.m.**

**Join the Meeting on Zoom**  
from your computer, tablet or smartphone

**You can also dial in using your phone**

United States: +1 (253) 215-8782

Meeting ID: 863 7463 1831

**Committee Members:** Ella Guilford, MSN, M.Ed., BSN, RN, Chair  
Quiana Daniels, BSN, RN, LPN, Member  
Heleena Hufnagel, MBA-HCA, BS, Member  
Tiffany Randich, RN, LPN, Pro Tem  
Diana Meyer, DNP, RN, NEA-BC, FAEN, Pro Tem

**Staff:** Shana Johnny, DNP, RN, Nursing Practice Consultant  
Margaret Holm, JD, RN, Nursing Practice Consultant  
Marlin Galiano, MN, RN, Nursing Practice Consultant  
Seana Reichold, Staff Attorney  
Luis Cisneros, Staff Attorney  
Dennis Gunnarson, Administrative Assistant  
Deborah Carlson, MSN, RN, Nursing Practice Director  
Rebecca Nylin, MNc, RN

**Questions:**

Please contact us at 360-236-4703 if you:

- Have questions about the agenda.
- Want to attend for only a specific agenda item.
- Need to make language or accessibility accommodations.

**Language and Accessibility:**

If you plan to attend and need language or accessibility services, WABON can arrange help. Please contact us at least one week before the meeting, but no later than March 22, 2024.

Need this document in another format? Please call 800-525-0127.

Deaf or hard of hearing customers:

- Call: 711 (Washington Relay)
- Email: [civil.rights@doh.wa.gov](mailto:civil.rights@doh.wa.gov)

**Meeting Minutes:**

WABON records meetings to help write accurate minutes. Minutes are approved at the WABON business meeting. WABON posts minutes on our website [Meetings | WABON](#).

All minutes and recordings are public records. They are available on request from the Department of Health (DOH) at [Public Records | WA DOH](#).

**Washington State Board of Nursing (WABON)**  
**Consistent Standards of Practice Sub Committee**  
**April 2, 2024 12 p.m. to 1 p.m.**

- I. 12:00 PM Opening – Ella Guilford, Chair**
  - A. Call to Order – Ella
  - B. Public Disclosure Statement – Ella
  - C. Introductions of Members, Staff, and Public – Ella/Shana
- II. Standing Agenda Items**
  - A. Announcements/Hot Topic/WABON Business Meeting Update
    - i. Legislative Updates – Quiana
    - ii. Presentations/Webinars – Shana
  - B. Review of Draft Minutes – February 2, 2024 – Ella
- III. Old Business**
  - A. Informed Consent Advisory Opinion Update – Public Workshops – Shana
  - B. CAQ – RN Delegation: COVID-19 Tests Update – Shana
  - C. Quality Improvement/CSPSC’s Prioritization Work Update – Shana
- IV. New Business**
  - A. Overview of Practice Data Project – Student Project – Rebecca
  - B. Non-Nurse Licensure Compact (NLC) State Comparison School – RN Delegation on Out-of-State Field Trips – Debbie
- V. Public Comment** – This time allows for members of the public to present comments to the subcommittee. For issues regarding disciplinary cases, call 360-236-4713.
- VI. Ending Items**
  - A. Review of Actions
  - B. Meeting Evaluation
  - C. Date of Next Meeting – June 4, 2024
  - D. Adjournment



## **Washington State Board of Nursing (WABON) Consistent Standards of Practice Subcommittee Minutes**

February 2, 2024 12: 00 p.m. to 1: 00 p.m.

**Committee Members Present:** Ella Guilford, MSN, M.ED., BSN, RN, Chair  
Heleen Hufnagel, MBA-HCA, BS, Member  
Quiana Daniels, BSN, RN, LPN, Member  
Tiffany Randich, RN, LPN, Pro Tem  
Diana Meyer, DNP, RN, NEW-BC, FAEN, Pro Tem

**Staff:** Deborah Carlson, MSN, PMC, CPM, RN, Director of Nursing Practice  
Shana Johnny, DNP, MN, RN, Nursing Practice Consultant  
Margaret Holm, JD, RN, Nursing Practice Consultant  
Dennis Gunnarson, Administrative Assistant  
Seana Reichold, Staff Attorney

### **Opening:**

Committee Chair Ella Guilford called the meeting to order at 12:03 p.m. The Consistent Standards of Practice subcommittee members and staff were introduced. Ella Guilford read the Public Disclosure Statement.

### **Announcements:**

- Ella introduced the Commission members.
- Debbie Carlson introduced the staff.
- Shana Johnny introduced new staff and support staff; Josh Smoots is Programs Specialist for Operations; Kathy Bay is with the Rural Hospital and High School pilot; Rachel Purcell in Communications, and four new students are joining us for various projects.
- Ella introduced the Hot Topics.
- Discussion and agreement from members to move the CSPSC to the first Friday to the first Tuesday of the month from 12:00 a.m. to 1:00 p.m.
- Quina introduced the Legislative Update.
- Ella opened the floor for public comment.
- Debbie provided an update on the status of Patient Abandonment and Commonly Asked Questions (CAQs) on the website.
- Debbie provided an update on the status of CSPSC Position Description.
- Debbie provided an update on the status of web updates/logo changes.
- Shana introduced the presentations/webinars.
- Ella introduced the informed consent project.



## **Washington State Board of Nursing (WABON) Consistent Standards of Practice Subcommittee Minutes**

February 2, 2024 12: 00 p.m. to 1: 00 p.m.

### **Draft Minutes:**

CSPSC agreed to move the December 1, 2023, draft minutes to the March WABON business meeting. CSPSC members recommend the WABON approve the minutes.

### **Old Business:**

**Informed Consent Advisory Opinion** – Shana provided an update and announced that the first workshops provided good recommendations from the public and partners. Additional workshops will be scheduled. Notification will be sent to the public through GovDelivery distribution list and an invitation to key partners.

**Registered Nurse (RN) Delegation: Commonly Asked Questions (CAQs)** – Debbie provided an update about the CAQ drafts related to RN delegation. Staff continue to refine these documents.

**COVID-19 Screening Workshop Update** – Shana provided an update about the questions and challenges with the COVID-19 screening CAQs. Significant changes have emerged since the emergency waiver was lifted last May. Some of the challenges are with the authority of the RN to delegate. Facilities may not have an RN and sufficient staff available to continue testing, or they might have unlicensed assistive personnel (UAP) available to perform testing, but do not have an RN to delegate to the UAP. Another issue is whether an order is required from an authorized practitioner to do CLIA-waived COVID-19 testing. Meetings were held with concerned parties, and email follow-up was sent to concerned parties to communicate next steps.

**Quality Improvement/CSPSC's Prioritization Work Update:** Shana provided an update about the work on the prioritization model for CSPSC activities. The model is under development and will be tested shortly. This work is guided by Diana Meyer. Ms. Meyer explained that this will allow us to be timely about completing requests with the resources available.

### **New Business:**

**Multistate License Implementation** – Ms. Carlson previewed the website and the resources available to self-educate us as we address lots of questions that are coming in. There are eleven states that are not in the Nurse Licensure Compact (NLC).



**Washington State Board of Nursing (WABON)  
Consistent Standards of Practice Subcommittee Minutes**

February 2, 2024 12: 00 p.m. to 1: 00 p.m.

**CSPSC Position Description Revision work**– Ms. Carlson reviewed the draft. The CSPSC reached consensus to send the draft to the WABON Board Meeting in January for approval.

**Public Comment:** Gail McGaffick commented on the collaborative work going into the RN Delegation CAQs listed in the packet. Erika Stardig commented on the guidance being offered to RN delegators.

**Ending Items**

**Date of Future Meetings in 2024** – April 2, June 4, August 6, and October 1, December 3

Adjournment 12:47 PM

DRAFT



CAQ:

Adopted: TBD

Reviewed/Revised:

Rescinded:

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## Commonly Asked Questions (CAQ) V. 3 SLJ

### Category: Corona Virus-19 (COVID-19) Testing

### Registered Nurse (RN) Scope of Practice: COVID-19 Testing

**Can the registered nurse (RN) perform a Clinical Laboratory Improvement Amendments (CLIA)-waived Point-of-Care (POC) COVID-19 test without an order or standing order from an [authorized health care practitioner](#)?**

Yes.

The RN may perform a CLIA-waived POC COVID-19 antigen test based on the nursing process without an order or standing order from an [authorized health care practitioner](#) because a CLIA-waived test is considered a screening test and not a diagnostic test. Employers/facilities may have policies requiring an order for these tests and other requirements, such as completion of competency assessment, and quality control testing. The employer/facility must have a CLIA-waived certification:

[Medical Test Sites \(MTS\) | Washington State Department of Health](#)

[Waived Tests | CDC](#)

The facility/employer should follow established guidelines specific to the facility type:

[Point of Care Testing Guidelines \(wa.gov\)](#)

The employer/facility must follow quality control measures as required with the CLIA-waived certification and/or as required by accreditation organizations (e.g., Joint Commission):

[COVID-19 - Quality Control Testing for COVID-19 Tests | Laboratory | Quality System](#)

[Assessment for Nonwaived Testing Quality System Assessment \(QSA\) | The Joint Commission](#)

Other Resources:

[COVID-19 Testing: Health Care Provider Resources & Recommendations | Washington State Department of Health](#)

[Reporting COVID-19 Test Results for Point-of-Care Testing Facilities | Washington State Department of Health](#)

[RN Authority with COVID-19 CLIA-Waived Tests in School Settings | WABON](#)

[Testing in Schools Frequently Asked Questions | Washington State Department of Health](#)

[Guidance for SARS-CoV-2 Rapid Testing Performed in Point-of-Care Settings | CDC](#)

[Waived Tests | CDC](#)



CAQ:

Adopted: **TBD**

Reviewed/Revised:

Rescinded:

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**Can the registered nurse (RN) perform a Point-of-Care Test (POC) polymerase chain reaction (PCR) COVID-19 test without an order or standing order from an [authorized health care practitioner](#)?**

Yes. An order or standing order from an [authorized health care practitioner](#) is required for the RN to perform a POC PCR COVID-19 test. A PCR test is considered the “gold standard” for COVID-19 tests as they are more likely to detect the virus than antigen tests. A PCR is regarded as a diagnostic test instead of a screening test.

[Medical Test Sites \(MTS\) | Washington State Department of Health](#)

[COVID-19 RT-PCR Test - Healthcare Provider Fact Sheet \(fda.gov\)](#)

[COVID-19 Testing: Health Care Provider Resources & Recommendations | Washington State Department of Health](#)

[Reporting COVID-19 Test Results for Point-of-Care Testing Facilities | Washington State Department of Health](#)

## Category: Corona Virus-19 (COVID-19) Testing

### Licensed Practical Nurse (LPN) Scope of Practice: COVID-19 Testing

**Can the licensed practice nurse (LPN) perform a Clinical Laboratory Improvement Amendments (CLIA)-waived Point-of-Care (POC) COVID-19 test without an order or standing order from an [authorized health care practitioner](#)?**

No. The LPN does not practice independently. The LPN may perform a CLIA-waived POC COVID-19 antigen test under the direction/orders and supervision of the RN or [authorized health care practitioner](#) in any setting. The LPN may follow [standing orders](#). Employers/facilities may have policies that require an order for these tests and other requirements (e.g., competency assessment completion and quality control testing). The employer/facility must have a CLIA-waived certification (Citation):

[Medical Test Sites \(MTS\) | Washington State Department of Health](#)

[Waived Tests | CDC](#)

The facility/employer should follow established guidelines specific to the facility type: [Point of Care Testing Guidelines \(wa.gov\)](#)

The employer/facility must follow quality control measures as required with the CLIA-waived certification and as required by accreditation organizations (e.g., Joint Commission):

[COVID-19 - Quality Control Testing for COVID-19 Tests | Laboratory | Quality System](#)

[Assessment for Nonwaived Testing Quality System Assessment \(QSA\) | The Joint Commission](#)





CAQ:

Adopted: TBD

Reviewed/Revised:

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Other Resources:

[COVID-19 Testing: Health Care Provider Resources & Recommendations | Washington State Department of Health](#)

[Reporting COVID-19 Test Results for Point-of-Care Testing Facilities | Washington State Department of Health](#)

**Can the licensed practical nurse (LPN) perform a Point-of-Care Test (POC) polymerase chain reaction (PCR) COVID-19 test without an order or standing order from an [authorized health care practitioner](#)?**

No. The LPN does not practice independently. The LPN may perform a CLIA-waived POC COVID-19 antigen test based on the direction/orders and supervision of the RN or [authorized health care practitioner](#). The LPN may follow standing orders.

[Medical Test Sites \(MTS\) | Washington State Department of Health](#)

[COVID-19 RT-PCR Test - Healthcare Provider Fact Sheet \(fda.gov\)](#)

[COVID-19 Testing: Health Care Provider Resources & Recommendations | Washington State Department of Health](#)

[Reporting COVID-19 Test Results for Point-of-Care Testing Facilities | Washington State Department of Health](#)

**Is the licensed practical nurse (LPN) allowed to delegate COVID-19 testing to the nursing assistant-registered/nursing assistance-certified (NA-R/NA-C), home care aide-certified (HCA-C), medical assistant-registered/medical assistant/certified (MA-R/MA-C) or non-credentialed staff?** In any setting, the LPN cannot delegate tasks to the NA-R/NA-C, HCA-C, MA-R/MA-C, or non-credentialed staff.

## Category: Corona Virus-19 (COVID-19) Testing

### Registered Nurse (RN) Delegation of COVID-19 Testing in Public and Private School Settings, Kindergarten-Twelve (K-12)

**Can the school registered nurse (RN) delegate to the nursing assistant-registered/nursing assistant-certified (NA-R/NA-C), medical assistant-registered/medical-assistant-certified (MA-R/MA-C), or non-credentialed staff to perform Point-of-Care (POC) Clinical Laboratory Improvement Amendments (CLIA)-waived COVID-19 testing or POC polymerase chain reaction (PCR) COVID-19 testing?**

Yes. COVID-19 testing requires RN delegation in the school setting to perform CLIA-waived antigen test or PCR COVID-19 test in public and private schools, kindergarten-twelve (K-12) grades. Based on the nursing assessment, the RN may delegate a POC COVID-19 antigen test





CAQ:

Adopted: TBD

Reviewed/Revised:

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without an order or standing order from an [authorized health care practitioner](#), because A CLIA-waived test is considered a screening test, not a diagnostic test. An order or standing order from an [authorized health care practitioner](#) is required for the RN to delegate a POC PCR test. Schools may have policies that require an order for these tests and other requirements (e.g., competency assessment completion and quality control testing). The school or school district must have a CLIA-waived certification ~~to make that determination, t~~[to make that determination](#). The school RN must follow the delegation process outlined in [RCW 18.79.260 \(3\)\(a\)](#) ~~to make that determination~~.

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[Medical Test Sites \(MTS\) | Washington State Department of Health](#)

[Waived Tests | CDC](#)

[RN Authority with COVID-19 CLIA-Waived Tests in School Settings | WABON](#)

[Testing in Schools Frequently Asked Questions | Washington State Department of Health](#)

[Point of Care Testing Guidelines \(wa.gov\)](#)

[COVID-19 - Quality Control Testing for COVID-19 Tests | Laboratory | Quality System](#)

[Assessment for Nonwaived Testing Quality System Assessment \(QSA\) | The Joint Commission](#)

[COVID-19 Testing: Health Care Provider Resources & Recommendations | Washington State Department of Health](#)

[Reporting COVID-19 Test Results for Point-of-Care Testing Facilities | Washington State Department of Health](#)

**Is registered nurse (RN) delegation required if a student self-tests for a COVID-19-waived test using a Clinical Laboratory Improvement Amendments (CLIA)-waived test in public and private schools, kindergarten-twelve (K-12) grades?**

No. RN delegation is not required if a student does a self-test using a COVID-19 CLIA-waived test. The RN can direct school staff to instruct the student to do the self-test following the COVID-19 test kit instructions, including observing the student doing a self-test, and reporting the results to the school RN. The school or school district should have policies and procedures for students to perform self-testing.

[COVID-19 Self-Testing Guidance for Establishments \(wa.gov\)](#)

[Medical Test Sites \(MTS\) | Washington State Department of Health](#)

[Waived Tests | CDC](#)

[RN Authority with COVID-19 CLIA-Waived Tests in School Settings | WABON](#)

[Testing in Schools Frequently Asked Questions | Washington State Department of Health](#)

[Point of Care Testing Guidelines \(wa.gov\)](#)

[COVID-19 - Quality Control Testing for COVID-19 Tests | Laboratory | Quality System](#)

[Assessment for Nonwaived Testing Quality System Assessment \(QSA\) | The Joint Commission](#)

[COVID-19 Testing: Health Care Provider Resources & Recommendations | Washington State Department of Health](#)

[Reporting COVID-19 Test Results for Point-of-Care Testing Facilities | Washington State Department of Health](#)



CAQ:

Adopted: TBD

Reviewed/Revised:

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**[RCW 74.39.050: Individuals with functional disabilities—Self-directed care. \(wa.gov\)](#)**

**Can the registered nurse (RN) who volunteers at the school perform Point of Care (POC) Clinical Laboratory Improvement Amendments (CLIA)-waived COVID-19 or (POC) polymerase chain reaction (PCR) COVID-19 test in public and private schools, kindergarten-twelve (K-12) grades?**

Perhaps. The RN performing POC CLIA-waived or PCR COVID-19 tests to students in public and private schools, K-12 grades, must be employed or have a formal agreement/contract with the school or school district.

**Can the registered nurse (RN) who works for a private company that has the Medical Test Site Waiver perform Clinical Laboratory Improvement Amendments (CLIA)-waived COVID-19 or POC polymerase chain reaction (PCR) COVID-19 tests in public and private schools, kindergarten-twelve (K-12) grades?**

Maybe. The RN working for a private company may perform POC CLIA-waived or PCR COVID-19 tests on students in public and private schools, K-12 grades if there is a formal agreement/contract agreement/contract with the school or school district.

**What should schools do if they don't have a registered nurse (RN) employed or contracted with the school to perform COVID-19 tests?**

For schools without an RN, an option may be to offer take-home COVID-19 rapid antigen tests or have parents/legal guardians test the student.. Staff member can hand a rapid antigen COVID-19 tests to students/parents and staff for individual or self-administered use.

**Can the registered nurse (RN) who works for a county health department or the Washington State Department of Health (WA DOH) perform Point of Care (POC) Clinical Laboratory Improvement Amendments (CLIA)-waived COVID-19 or (POC) polymerase chain reaction (PCR) COVID-19 tests in public and private schools, and kindergarten-twelve (K-12) grades?**

Maybe. The RN working for a county health department or the WA DOH may perform POC CLIA-waived COVID-19 or PCR tests to students in public and private schools, K-12 grades if there is a formal agreement/contract agreement/contract with the school or school district.

**Can the parent or legal guardian sign a form to allow a non-credentialed school staff person to perform a Point of Care (POC) Clinical Laboratory Improvement Amendments (CLIA)-waived COVID-19 test or a Point of Care polymerase chain reaction (PCR) COVID-19 test without registered nurse (RN) delegation through the process of in loco parentis (in place of the parent) in public and private schools, kindergarten-twelve (K-12) grades?**

No. The school laws do not allow a parent or legal guardian to sign a form to allow a non-credentialed school staff person to perform a CLIA-waived COVID-19 test.



CAQ:

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**Can a student's parent or legal guardian perform a CLIA-waived test in public and private schools, kindergarten-twelve (K-12) grades?**

Yes. The laws and rules do not prohibit a parent or legal guardian from performing a CLIA-waived test at the school. This activity would be like testing at home.

**Can the registered nurse (RN) delegate to non-credentialed individuals (such as bus drivers) whom the school or facility does not employ to perform a Clinical Laboratory Improvement Amendments (CLIA)-waived COVID-19 test or a PCR COVID-19 test in public and private schools, kindergarten-twelve (K-12) grades?**

No. The school RN cannot delegate COVID-19 testing to a non-credentialed individual who is not a staff member (such as a bus driver) to perform a CLIA-waived test.

## Category: Corona Virus-19 (COVID-19) Testing

### Registered Nurse (RN) Delegation of COVID-19 Testing – General Delegation

**Can the registered nurse (RN) delegate to credentialed or non-credentialed staff, such as the nursing assistant, home care aide, medical assistant, or non-credentialed staff to perform population-based (pooled) Clinical Laboratory Improvement Amendments (CLIA)-waived or PCR COVID-19 tests without the RN assessing each person?**

No. The delegation process requires the RN to assess the patient before delegating tasks to the UAP and provide instructions to the UAP to perform the task. This process may be done using a routine screening form specific to COVID-19 and testing that does not require nursing judgment with instructions on when to notify the RN based on specific responses or questions/clarifications.

**Does the registered nurse (RN) delegator need to be on the premises when credentialed or non-credentialed staff perform Clinical Laboratory Improvement Amendments (CLIA)-waived tests or polymerase chain reaction (PCR) COVID-19 tests?**

No. The RN delegator does not need to be on the premises when credentialed or non-credentialed staff perform CLIA-waived or PCR COVID-19 tests. The RN must be available to answer questions or provide additional instructions as needed.

**What is the RN's responsibility for reporting positive COVID-19 tests?**

The RN is responsible for following the employer/facility processes in reporting positive COVID-19 tests. If the RN owns the business/facility, then the RN who owns the business/facility must report positive COVID-19 test results. w:



CAQ:

Adopted: TBD

Reviewed/Revised:

Rescinded:

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[Reporting COVID-19 Test Results for Point-of-Care Testing Facilities | Washington State Department of Health](#)

**Is the registered nurse (RN) required to have a Medical Test Site (MTS) certification to perform Clinical Laboratory Improvement Amendments (CLIA)-waived or polymerase chain reaction (PCR) COVID-19 tests?**

It depends. MTS Certification is required by the employer/facility to perform CLIA-waived tests regardless of setting. If the RN owns the business/facility, then the business/facility must have the appropriate Medical Test Site certification.

[Medical Test Sites \(MTS\) | Washington State Department of Health](#)

**Is the registered nurse (RN) required to document COVID-19 testing activities?**

Yes. The RN must document the care provided, including COVID-19 testing activities, regardless of the setting. Documentation can be done electronically or on paper using a patient's medical record. The RN should follow the employer/facility documentation policies and procedures. Standardized screening forms that include the results may be used for documentation. Documentation of positive tests must be reported to the Washington State Department of Health.

[Reporting COVID-19 Test Results for Point-of-Care Testing Facilities | Washington State Department of Health](#)

**Can the registered nurse (RN) delegate to non-credentialed staff in a juvenile detention center to perform Clinical Laboratory Improvement Amendments (CLIA)-waived COVID-19 tests or polymerase chain reaction (PCR) COVID-19 tests?**

No. The laws and rules only allow the RN to delegate to non-credentialed staff in public and private schools. In juvenile detention centers, the RN can delegate COVID-19 testing to the nursing assistant-registered/nursing-assistant-certified (NA-R/NA-C). An option may be to have specific staff obtain the NA-R or NA-C credential.

**Can the registered nurse (RN) delegate to non-credentialed staff in a juvenile detention center that provides K-12 basic education services to juveniles to perform Clinical Laboratory Improvement Amendments (CLIA)-waived COVID-19 tests or polymerase chain reaction (PCR) COVID-19 tests?**

Yes. The RN is allowed to delegate COVID-19 testing to non-credentialed staff in schools provided through the Institutional Education Program/Office of Superintendents of Public Instruction (OSPI).

[Institutional Education \(ospi.k12.wa.us\)](https://ospi.k12.wa.us)

The RN must follow the delegation process outlined in [RCW 18.79.260 \(3\)\(a\)](#) to make that determination.



CAQ:

Adopted: **TBD**

Reviewed/Revised:

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**What are the recommendations if a business or facility does not have a registered nurse to delegate to staff?**

Some businesses or facilities will not have an RN available to delegate to staff and may not have credentialed staff available. For businesses/facilities without an RN, options may be to offer take-home COVID-19 rapid antigen tests or have the patient self-test on site. Organizations should consider identifying an alternative mechanism and source of authority to conduct COVID-19 testing. This process is outside the Washington State Board of Nursing (WABON) authority. WABON recommends that business or facility consult with their legal counsel.

**Can the registered nurse (RN) delegate to non-credentialed staff in a daycare, Head Start, or preschool to perform Clinical Laboratory Improvement Amendments (CLIA)-waived COVID-19 testing?**

No. The RN cannot delegate tasks, like COVID-19 testing to non-credentialed staff in a daycare, head start, or preschool. The laws and rules regarding daycares, Head Starts, and preschools permit the parent or legal guardian to consent to provide health care. This permission is known as loco parentis (in place of the parent) and allows these settings to designate staff to act in place of a parent or legal guardian. This also allows the staff to test without an order or standing order from an **authorized healthcare practitioner**. The RN may be involved in training staff and providing consultation and guidance regarding the testing. The daycare, Head Start, or preschool must have the Medical Test Site Certification. If a parent or legal guardian does the testing, the site would not be required to have the MTS Certification. The Washington State Board of Nursing (WABON) recommends that early childhood program consult with the Department of Children, Youth, and Families (DCYF) and their legal counsel.



## Non-Nurse Licensure Compact (NLC) State Comparison Summary School Registered Nurse Delegation – Out-of-State Field Trips

The Washington State Board of Nursing (WABON) is a member of the National Council of State Boards of Nursing (NCSBN) Nurse Licensure Compact (NLC). WABON gets frequent questions about the school nurse accompanying a student on an out-of-state field trip or delegating to non-credentialed school staff who accompany a student on an out-of-state field trip.

- For states that are not in the NLC, or for a Washington State licensed nurse who does not have a multistate license, the WABON recommends the school nurse contact the state to determine if the school nurse can provide care to a student or delegate to non-credentialed or credentialed staff to provide care to a student while in that state without a license in that state. The WABON strongly encourages nurses who accompany students on field trips to other states that are in the NLC to have a multistate license.
- If the state is a member of the NLC, checking with the state is still applicable for a nurse with a multi-state license to determine if the school nurse can delegate tasks to a non-credentialed or credentialed person in another state. The laws applicable will always be those where the student is located.

[Licensure Compacts](#) | [NCSBN NLC Member States](#)

The table below is intended for informational purposes only, to assist nurses in gathering further information or direction from boards of nursing in other states. It may not accurately reflect the current or future state of the law in each state. This document is not intended as legal advice.

### Responses Regarding Care of Students from Non-NLC Compact States

State	Summary
<b>Alaska</b> <a href="#">Alaska Board of Nursing,</a> <a href="#">Professional Licensing,</a> <a href="#">Division of Corporations,</a>	<ul style="list-style-type: none"><li>• No laws or rules for nursing delegation in place to non-credentialed or credentialed individuals from other states</li><li>• Exception: Practice of nursing by nurse licensed in another state whose employment responsibilities include transporting patients into, out of, or through the state; however, this exception is valid for a period not to exceed 48 hours for each transport <a href="#">NursingStatutes.pdf (alaska.gov)</a> 08.68.800</li></ul>





## Non-Nurse Licensure Compact (NLC) State Comparison Summary School Registered Nurse Delegation – Out-of-State Field Trips

State	Summary
<a href="#">Business and Professional Licensing</a>	
<b>California</b> <a href="#">California Board of Registered Nursing</a>	<p>If the RN does not hold themselves out as a professional nurse licensed to practice in this State and if the nurse has an engagement, made in another State or country, requiring the nurse to accompany and care for a patient temporarily residing in this State during the period of such engagement, a nurse legally qualified by another State or country may give nursing care to such patient in this State (<a href="#">California Nursing Practice Act 2370</a>). The law does not include language regarding delegation by the RN in Washington State to non-credentialed or credentialed school staff accompanying the student.</p>
<b>Connecticut</b> <a href="#">Connecticut Board of Examiners for Nursing</a>	<p>A qualified RN or LPN may care for a student temporarily in this State for no longer than seventy-two hours provided the nurse does not represent themselves as a nurse licensed to practice in this State. An RN or LPN who cares for a student longer than 72 hours must have a temporary permit or be licensed in this State.</p> <p><a href="#">Connecticut Statute 20-101 Temporary Practice Title 20, Chapter 378 - Nursing :: 2022 Connecticut General Statutes :: US Codes and Statutes :: US Law :: Justia</a></p> <p><a href="#">Connecticut Department of Education-Field Trips: Guidance for School Nurses</a></p>
<b>Hawaii</b> <a href="#">Hawaii Professional &amp; Vocational Licensing Division   Board of Nursing</a>	No Response
<b>Illinois</b> <a href="#">Illinois Board of Nursing</a>	No Response





## Non-Nurse Licensure Compact (NLC) State Comparison Summary School Registered Nurse Delegation – Out-of-State Field Trips

State	Summary
<b>Michigan</b> <a href="#">Michigan Board of Nursing</a>	<ul style="list-style-type: none"> <li>Nurses must have a Michigan nursing license when providing nursing care to students on a field trip (whether direct care or telehealth). Exemptions are listed in <a href="#">MCL 333.16171</a>. Michigan does not offer temporary licensure.</li> </ul>
<b>Minnesota</b> <a href="#">Minnesota Board of Nursing</a>	<ul style="list-style-type: none"> <li>State exemptions do not address school nurses accompanying students on a school field trip or delegating to credentialed or non-credentialed individuals <a href="#">MCL 333.16171</a>.</li> <li>Minnesota does not offer temporary licensure.</li> </ul>
<b>Oregon</b> <a href="#">Oregon State Board of Nursing</a>	<ul style="list-style-type: none"> <li>Allows the non-resident nurse, licensed and in good standing in another state, who is providing health care for students who are in Oregon attending a school-sponsored event (where they are practicing on a single temporary event that does not exceed 30 days). This applies when the school RN is physically located in Oregon with their student and the school RN remains in the state of Washington and their student is physically within Oregon's borders. <a href="#">ORS 678.031(7)(g)</a></li> </ul>
<b>Nevada</b> <a href="#">Nevada State Board of Nursing</a>	<ul style="list-style-type: none"> <li>No laws or rules for nursing delegation in place to non-credentialed individuals from other states</li> <li>Exception: The practice of nursing in this state by any legally qualified nurse or nursing assistant of another state whose engagement requires the nurse or nursing assistant to accompany and care for a patient temporarily residing in this state during the period of one such engagement, not to exceed 6 months, if the person does not represent or hold himself or herself out as a nurse licensed to practice in this state or as a nursing assistant who holds a certificate to practice in this state (<a href="#">NRS: CHAPTER 632-616 – Nursing Nevada State</a>).</li> </ul>
<b>New York</b> <a href="#">New York State Board of Nursing</a>	<ul style="list-style-type: none"> <li>Allows nurses licensed in other states who are traveling through and caring for individuals from other states, employed by a school or other entity, to provide nursing care to those individuals without being required to apply for a New York nursing license. <a href="#">New York Education Law Section 6908 – Exempt Persons</a></li> </ul>



## Non-Nurse Licensure Compact (NLC) State Comparison Summary School Registered Nurse Delegation – Out-of-State Field Trips

State	Summary
<b>Washington, DC</b> <a href="#">Washington, DC Board of Nursing</a>	<ul style="list-style-type: none"><li>As a professional courtesy, the District of Columbia (DC) Board of Nursing does not require nurses providing care in the District for a brief period (60 days) to be licensed in the District. Licensed nurses are subject to the same practice standards as in the state they are currently licensed in. The DC Board of Nursing does not dictate how the school district functions with regards to medication administration to children by unlicensed personnel while on out-of-state trips and should follow the state's regulations.</li></ul>