

Delegated nursing

requirements and how they will be documented



Delegated nursing is now allowable through the school-based Medicaid program in AZ

As of 08/2025

Nursing delegation in the school setting is the assignment by the school nurse – to a competent unlicensed individual (also called unlicensed assistive personnel UAP) the performance of a selected nursing task in a selected situation for an individual student. The school nurse facilitates the UAP training, evaluation of UAP competence, and provides for ongoing supervision of the UAP and evaluation of the student's health outcomes. The nursing process can never be delegated.

Delegated nursing is allowable

As an increasing number of children with chronic health care issues are attending school, it is crucial that schools address the needs of these students to achieve optimal learning. Schools in Arizona need to arrange for adequate personnel to provide care during the school day. In addition, the Individuals with Disabilities Education Act (IDEA) mandates that all disabled children must be provided an education in the least restrictive environment

- To ensure the safety of the student, advanced planning and preparation are required to safely identify and train individuals who will be performing any medical task.
- In some cases, these individuals may be Unlicensed Assistive Personnel (UAP). It is best practice for employers to have policies and procedures that regulate how services will be provided to students and **provide training on a regular basis**. Employers need to recognize that licensed employees (school nurses) are mandated to follow their individual scope of practice as outlined by their Board of Nursing.
- Delegation to UAP by a school nurse means that the nurse retains accountability to ensure that delivery of care is implemented safely and effectively to produce positive health outcomes.

The National Association of School Nurses (NASN, 2016) recommends that delivery of health services in a school environment be supervised by a registered professional nurse (RN), with training in the specialized practice of school nursing. Due to budgetary constraints and a shortage of qualified nursing staff in many schools across Arizona, **Unlicensed Assistive Personnel (UAP) are utilized in a variety of settings.** Delegation to the UAP is the process **whereby the nurse retains accountability (training and documentation) to ensure that delivery of care is implemented safely and effectively to produce positive health outcomes that enhance student learning.**



Examples of chronic health conditions seen in schools include, but are not limited to:



asthma, diabetes, life-threatening allergies, genetic disorders, immunological disorders, cancer, orthopedic disorders, neuromotor disorders, mental health disorders and seizure disorders. Specialized health care may include; medication administration, gastrostomy feedings, catheterizations, ostomy care, tracheostomy care, ventilator management, central line monitoring and seizure management.

Clearly state
the services
will be
delegated

- In Arizona, an IEP should list the service as "**Nursing Services**" (or the specific medical task) under Related Services, with a clarifying note in the description that the task is "delegated by the Registered Nurse (RN) to trained Unlicensed Assistive Personnel (UAP)"
- **Service Category:** Related Services
- **Service Type:** School Nurse Services
- **Service Provider:** School RN or LPN / Trained Delegated Staff
- **Frequency:** Daily
- **Duration/Minutes:** Provide a realistic daily estimate (e.g., 10 or 15 minutes per day) to allow for safe protocol delivery and logging.

Core Components of a Delegation Log

A comprehensive delegation packet generally combines a skills checklist, training log, and mutual sign-off into a single accessible document

- In Arizona, the [AZ Board of Nursing](#) regulates delegation by RNs to Unlicensed Assistive Personnel (UAP) like school staff. A compliant checklist requires verifying the Five Rights of Delegation (Task, Circumstance, Person, Communication, Supervision) alongside a student-specific, task-based skills log.
- Lets review the key components of a nursing training for delegated tasks

Delegatee & Student Information

- **School District:** _____
- **Delegating School RN:** _____
- **RN License #:** _____
- **Unlicensed Staff (Delegatee) Name:**

- **Title/Role:** [e.g., Health Aide, Teacher, Front Office Staff]
- **Student Name:** _____
- **DOB:** _____ **Grade:** _____
- **Delegated Nursing Task:** [e.g., Glucagon Administration / Blood Glucose Monitoring]

EXMAPLE ONLY

Competency Verification

EXMAPLE ONLY

Part 1: Master RN Delegation Log

This log serves as the legal binder record to track which staff members are authorized to perform specific health tasks for individual students.

Student Name 	Date of Birth	Delegated Health Task	Named Delegatee (UAP / Aide)	Initial Training Date	Competency Checked? (Y/N)	Re-Evaluation Due Date
John Doe	10/12/2018	Gastrostomy Tube Feeding	Jane Smith, Para	09/02/2026	Y	12/02/2026
Emily Rose	04/05/2015	Epinephrine Admin	John Cruz, Coach	09/05/2026	Y	09/05/2027

Skill Competency Checklist

EXMAPLE ONLY

Part 2: Skill Competency Checklist

Task: Gastrostomy Tube (G-Tube) Feeding via Gravity Bag/Syringe

Delegatee Name: _____ Job Title: _____

Student Name: _____ DOB: _____

Method of Evaluation: *D* = Demonstration, *V* = Verbalizes, *B* = Both

Performance Criteria & Steps 	Method	Pass	Fail	Notes / Observations
1. Preliminary Steps				
Identifies the correct student, correct formula, and correct time.	B	[]	[]	Aligns with student Individualized Health Plan (IHP).
Washes hands thoroughly and gathers necessary supplies.	D	[]	[]	Syringe, extension set, formula, water.
Explains the procedure to the student in an age-appropriate manner.	D	[]	[]	
Positions student properly (sitting up or head elevated ≥ 30 degrees).	D	[]	[]	Must maintain position for 30 min post-feed.

Skill Competency Checklist

- EXMAPLE ONLY

2. Procedure Execution

Cleans the top of the formula container before opening.	D	☐	☐	
Uncaps the G-tube button port and primes/attaches the extension tubing.	D	☐	☐	Minimizes air entering the stomach.
Checks for tube placement, residual, or patency as directed by IHP.	B	☐	☐	Verbalizes when to hold feed based on residual.
Administers the formula slowly via gravity (does not force with plunger).	D	☐	☐	Holds syringe 6 inches above stomach level.
Flushes the tube with the prescribed amount of water after feeding.	D	☐	☐	Keeps tube clear and patent.
Disconnects tubing, clamps/caps button, washes and dries equipment.	D	☐	☐	

Skill Competency Checklist

- EXMAPLE ONLY

3. Safety & Emergency Actions

Verbalizes signs of intolerance (nausea, vomiting, abdominal distension).	V	☐	☐	Knows to stop the feed immediately .
Demonstrates step-by-step action plan if the G-tube becomes dislodged.	B	☐	☐	Covers site, contacts RN, calls parents.
Logs exact time, amount of formula given, water flush, and tolerance.	D	☐	☐	Documents immediately in the student health log.

Ongoing Supervision & Re-evaluation Log

- Delegation is not a "one-and-done" event. The log must feature a tracking section for periodic, mandatory check-ins (e.g., quarterly) to review protocols and re-verify skills

What tasks can be delegated

- Definition of symbols:
- * Medical provider order required
- Q Qualified to perform task with demonstrated competency
- S Qualified to perform task with training and demonstrated competency
- EM In emergencies with training and demonstrated competency X Should not perform task
- RN: Registered Nurse
- LPN: Licensed Practical Nurse
- UAP: (Unlicensed Assistive Personnel): Individuals working in a school health office, teachers, instructional assistants, school secretaries or other school personnel who have daily responsibilities for care of the student.
- Other: Bus drivers, bus monitors, cafeteria workers or custodians who have routine interaction with the student.

Procedure	RN	LPN	UAP	Other
ADL (Activity of Daily Living)				
Toileting / Diapering	Q	Q	Q	X
Toilet Training	Q	Q	Q	X
Dental Hygiene (tooth brushing)	Q	Q	Q	X
Lifting / Positioning	Q	Q	S	S
Procedure	RN	LPN	UAP	Other
Catheterization				
Clean Intermittent Cath *	Q	S	S	X
External Cath *	Q	S	S	X
Care of Indwelling Catheter *	Q	S	S	X
Ostomy Care *	Q	S	S	X
Skin Care	Q	S	S	X

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Procedure	RN	LPN	UAP	Other
Feeding				
Nutritional Screening	Q	S	X	X
Nutritional Assessment	Q	X	X	X
Oral-Motor Assessment	X	X	X	X
Oral Feeding	Q	Q	S	X
Naso-Gastric Feeding*	Q	S	S	X
Monitoring of Continuous Feed	Q	S	S	X
Gastrostomy Tube Feeding or Venting*	Q	S	S	X
Jejunostomy Feed *	Q	S	S	X
Naso-Gastric Tub Insertion *	Q / EM	S / EM	X	X
Naso-Gastric Tube Removal *	Q / EM	S / EM	EM	X
Gastrostomy Tube Reinsertion * Trained nurses and UAP may re-insert a deflated and clean gastrostomy button to keep the stoma open. Re-inflation of the balloon catheter is not an emergency procedure and is not recommended at school. If a nurse or UAP has been trained in balloon re-inflation, documentation of training and provider orders should be detailed.	Q / EM	S / EM	EM	X

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Procedure	RN	LPN	UAP	Other
Site Monitoring				
Ventricular Peritoneal Shunt *	Q	S	S	X
Central Intravenous Catheter * (Port, PICC or Broviac)	Q	S	S	S
Ostomies *	Q	S	S	S
Procedure	RN	LPN	UAP	Other
Seizure				
Seizure Precautions	Q	S	S	S
Vagus Nerve Stimulation (VNS)* w/ Magnet	Q	S	S	EM

Procedure	RN	LPN	UAP	Other
Medication				
Oral *	Q	S	S	X
Over The Counter (OTC)	Q	Q	S	X
Injection * (for Insulin see Diabetes)	Q	S	EM	X
Auto-injectable Epinephrine *	Q	S	EM	S / EM
Inhalation *	Q	S	S	S / EM
Oxygen Administration / Monitoring	Q	S	S	EM
Nasal Cannula / Mask *	Q	S	S	X
Ear / Eye Drops *	Q	S	S	X
Topical *	Q	S	S	X
Per Nasogastric Tube *	Q	S	S	X
Per Gastrostomy Tube *	Q	S	S	X
Rectal Suppositories *	Q	S	EM	X
Intranasal Med *	Q	S	EM	X
The administration of intranasal medication is a specialized nursing procedure that is not recommended in a school setting				
Oral Chemotherapy *	X	X	X	X
The administration of chemotherapy medications is a specialized nursing procedure that is not recommended in the school setting				
Intravenous Medication Administration *	Q	X	X	X
The administration of IV medications or fluids is a specialized nursing procedure that is not recommended in the school setting				

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Procedure	RN	LPN	UAP	Other
Respiratory Assistance				
Postural Drainage *	Q	S	S	X
Percussion *	Q	S	S	X
Suctioning*				
Oral *	Q	S	S	EM
Tracheostomy *	Q	S	S	EM
Trach Change *	Q	S / EM	EM	X
Mechanical Ventilator Care *	Q	S	X	X

Screenings				
Growth / BMI	Q	S	S	X
Vital Signs	Q	S	S	X
Hearing	Q	S	S	X
Vision	Q	S	S	X
Scoliosis	Q	S	S	X

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Procedure	RN	LPN	UAP	Other
Diabetic Procedure *				
Blood Glucose Monitoring	Q	S	S	X
Urine Ketones	Q	S	S	X
Insulin Injection *	Q	S	S	X
Insulin Pump Bolus *	Q	S	S	X
CHO Counting / Dosage Calculation *	Q	S	S	S
Pump Site Change *	Q / EM	S / EM	X	X
Glucagon *	* Please reference ARS 15-344.01 regarding glucagon management			

Procedure	RN	LPN	UAP	Other
Development and Implementation of Individual Healthcare Plan (IHP), IEP, or 504				
Health Care Plan	Q	S	X	X
Emergency Protocols	Q	S	X	X
IEP / 504 Plan	Q	S	X	X

What do the codes look like?



UAPs will use the RN and LPN codes to document their delegated services



They will require an RN or LPN SUPERVISOR signature on all session logs



The claims will get submitted under the supervising providers credentials and AHCCCS id



RN – T1002 per unit \$28.52



LPN – T1003 per unit \$18.38

How will UAPs document for delegated tasks in DSCtop

- If they have an RN supervisor their service type will be – delegated nursing health tech RN which will require an RN supervisor sign off
- If they have an LPN supervisor their service type will be - delegated nursing health tech LPN, which will require an LPN supervisor sign off
- Both service types will see LOCK when they sign their services in DSCtop
- The RN and LPN will approve and sign in DSCtop under the supervisor Auth section in DSCtop

UAP's what will their documentation screen look like

- They will select the activity they are performing for the delegated task
- Same as the nursing staff

The screenshot displays a web-based documentation interface titled "Record Session for EMMIE BEST". It features a table with columns for "Activity" and "Minutes". The "Activity" column has a dropdown menu open, showing a list of activities with their abbreviations and descriptions. The activities listed are: NS - No Service - must place a zero or number of minutes after the abbrev., B - Behavioral Support, G - Bowel Management, M - Medication Administration, N - Nutrition, P - Physical Treatment, R - Respiratory Management, S - Seizure Management, U - Urinary Management, X - See Notes, and NB - NOT BILLABLE - must place a zero or number of minutes after the abbrev. The "Minutes" column is currently empty. To the right of the table, there is a "Save and" button and a link to "Edit Signature".

Activity	Minutes
Select Activity	
NS - No Service - must place a zero or number of minutes after the abbrev.	
B - Behavioral Support	
G - Bowel Management	
M - Medication Administration	
N - Nutrition	
P - Physical Treatment	
R - Respiratory Management	
S - Seizure Management	
U - Urinary Management	
X - See Notes	
NB - NOT BILLABLE - must place a zero or number of minutes after the abbrev.	

What if a health aide with an AHCCCS ID performs delegated nursing tasks

They will require a separate log in for DSCtop with the service type delegated nursing by health aide

They will see LOCK when they sign their services in DSCtop

The RN or LPN will approve and sign in DSCtop under the supervisor Auth section in DSCtop

The claims will get submitted under the health aide name and AHCCCS ID

They will use code S5125 15 min unit (must be 8 mins or more) \$6.80

Delegated HA what will their documentation screen look like

- They will select the activity they are performing for the delegated task
- Same as the nursing staff, the list of ADLS will not show here as they do not require supervisor sign off that is why they need a separate log in for DSCtop

They will need two logins one for HA ADLs and one for Delegated nursing services

The screenshot displays a web application interface titled "Record Session for EMMIE BEST". It features a table with columns for "Activity" and "Minutes". A dropdown menu is open under the "Activity" column, showing a list of activities with their abbreviations and descriptions. The activities listed are: NS - No Service - must place a zero or number of minutes after the abbrev., B - Behavioral Support, G - Bowel Management, M - Medication Administration, N - Nutrition, P - Physical Treatment, R - Respiratory Management, S - Seizure Management, U - Urinary Management, X - See Notes, and NB - NOT BILLABLE - must place a zero or number of minutes after the abbrev. The dropdown menu is currently showing "Select Activity" at the top. To the right of the table, there is a "Save" button and a "Sign" button.

Activity	Minutes
Select Activity	
NS - No Service - must place a zero or number of minutes after the abbrev.	
B - Behavioral Support	
G - Bowel Management	
M - Medication Administration	
N - Nutrition	
P - Physical Treatment	
R - Respiratory Management	
S - Seizure Management	
U - Urinary Management	
X - See Notes	
NB - NOT BILLABLE - must place a zero or number of minutes after the abbrev.	

The supervisor page for RNs/LPNs

RN and LPNs will review and confirm the delegated sessions

They can document any notes they want to accompany the session

They can return the sessions to the delegatee if there is something missing or inaccurate

Supervisor Authorization

[Message](#)

Supervise: Services

District: TEST DISTRICT

Search By: Assistant

Assistant: TRAINING SLA, LISA

Month: Apr

Year: 2026

[Select Students](#)

[Unconfirmed Services](#)

BACA, ANGEL LYNN »
1 Locked Services

BACA, ANGEL LYNN (05/01/2012) School: BEADY FARM 56 ICD10 Code(s): F81.9, None

- Goals:**
1. Angel will pronounce the S, SH, and SW sounds correctly in a sentence 8 of 10 times.
 2. Aritc 'a'
 3. New goal for Angel checking Edit

Services:

Select All: ☐

Date	Time In	Time Out	ICD-10 Code	Service	Group Size
4/15/2026	8:00 AM	8:30 AM	F81.9	ED-92609	N/A
Goals				Successful	Attempts % Progress
☐ New goal for Angel checking Edit				1	2 50 Satisfactory
Notes:			lkjolkjlkjohoj		Progress, Continue Goal
Status: Locked					

Supervisor Notes

[Check Spelling](#)

I have reviewed these services and authorize SLBS to submit them under my license number.

[Return Selected for Revision](#)

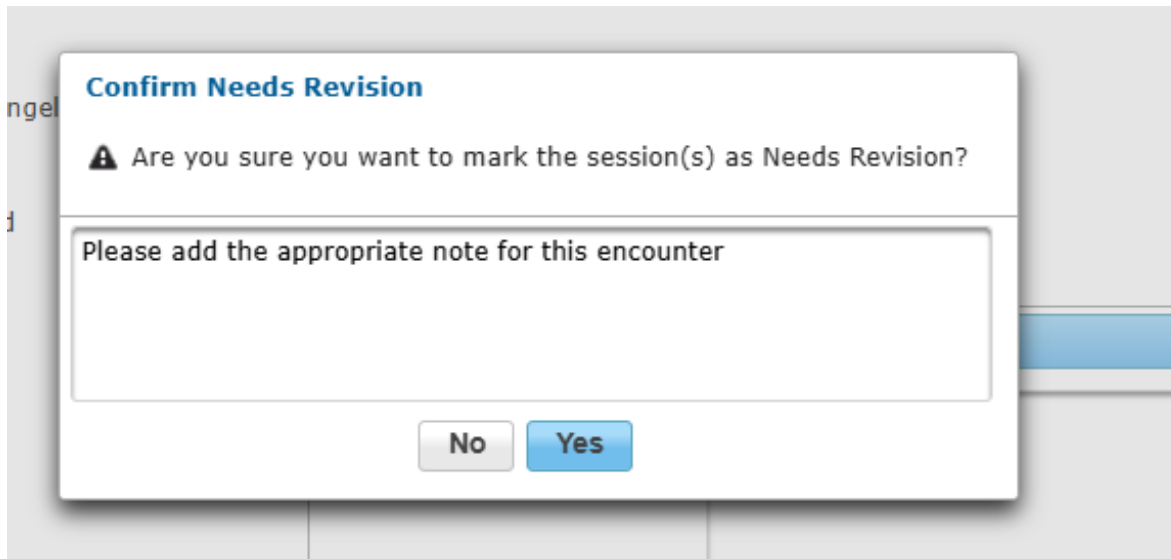
The selected services will be returned to the assistant for necessary revisions.

[Confirm Selected](#)

Encounters selected for revision will be returned to the delegate

Message alert the Delegate will see when they log into DSCtop

Supervisor revision box



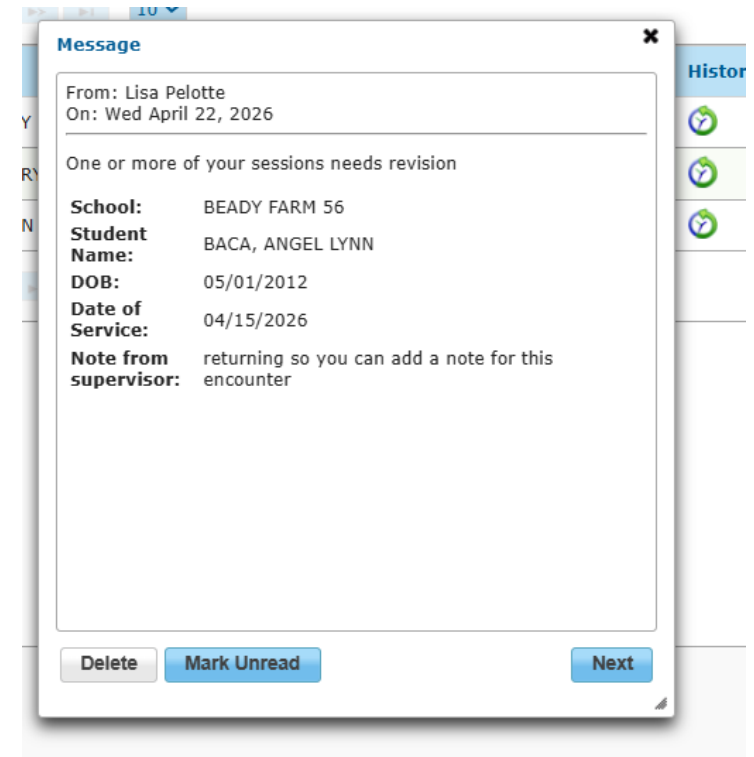
A dialog box titled "Confirm Needs Revision" with a warning icon. It asks the user if they are sure they want to mark the session(s) as Needs Revision. Below the question is a text area for adding a note for the encounter. At the bottom are "No" and "Yes" buttons.

Confirm Needs Revision

⚠ Are you sure you want to mark the session(s) as Needs Revision?

Please add the appropriate note for this encounter

No Yes



A message alert dialog box titled "Message". It shows the sender as Lisa Pelotte and the date as Wednesday, April 22, 2026. The message states that one or more sessions need revision and provides details for a specific session: School (BEADY FARM 56), Student Name (BACA, ANGEL LYNN), DOB (05/01/2012), Date of Service (04/15/2026), and a note from the supervisor. At the bottom are "Delete", "Mark Unread", and "Next" buttons.

Message

From: Lisa Pelotte
On: Wed April 22, 2026

One or more of your sessions needs revision

School: BEADY FARM 56
Student Name: BACA, ANGEL LYNN
DOB: 05/01/2012
Date of Service: 04/15/2026
Note from supervisor: returning so you can add a note for this encounter

Delete Mark Unread Next

Things to keep in mind

The delegated task needs to be outlined as a delegated service in the IEP/plan of care.

RN or LPN is responsible for training delegated staff in accordance with their professional scope of practice

All documentation related to training and supervision must be **maintained** by the LEA to support all training and supervision activities

The provider billing the claim will use their appropriate billing code. Meaning, if a health aide is rendering the delegated service, the health aide would bill.

If a provider is not registered with AHCCCS (UAP), the claim may be submitted by the RN/LPN if they are supervised by the RN/LPN



Questions?