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April 15, 2025

## RE: AB 228 – Pupil Health: epinephrine delivery system (Support)

Dear California Department of Public Health:

The California Conference of Local Health Officers (CCLHO), which represents the appointed physician health officers of California's 61 city and county jurisdictions, would like to express our recommendation to **support AB 228**. On April 4, 2025, the CCLHO Board of Directors voted to approve the support recommendation.

Existing law requires school districts, county offices of education, and charter schools to provide emergency epinephrine auto-injectors to school nurses or trained volunteer personnel, and authorizes school nurses and trained personnel to use epinephrine auto-injectors to provide emergency medical aid to persons suffering, or reasonably believed to be suffering, from an anaphylactic reaction. Existing law requires school districts, county offices of education, and charter schools to, among other things, store those emergency epinephrine auto-injectors in an accessible location upon need for emergency use and include that location in specified annual notices. AB 228 would replace all references to epinephrine auto-injectors or auto-injectable epinephrine in the above-described provisions with references instead to epinephrine delivery systems, as defined, and would require school districts, county offices of education, and charter schools to instead provide at least one type of United States Food and Drug Administration (FDA) approved epinephrine delivery system, as specified. The FDA recently approved epinephrine nasal spray for adults (Aug 2024) and children (March 2025).

CCLHO supports this simple update to ensure that California law keeps pace with FDA-approved epinephrine delivery options in schools.

CCLHO was established in statute in 1947 to advise the California Department of Public Health, other departments, boards, commissions, and officials of federal, state and local agencies, the Legislature, and other organizations on all matters affecting health.

Sincerely,

Aimee Sisson, MD, MPH  
President