



# County of Fairfax, Virginia

## AMENDMENT

AMENDMENT NO. 3

October 16, 2025

CONTRACT TITLE: Continuous Duty Nursing & Temporary Health Care Services

CONTRACTOR

22nd Century Technologies, Inc.  
8251 Greensboro Drive, Suite 900  
McLean, VA 22102

SUPPLIER CODE

1000039057

CONTRACT NO.

4400012383

By mutual agreement, Contract 4400012383 is amended to

1. Replace Section 1.4. SCOPE OF SERVICES, in its entirety as follows:
  - 1.4. Continuous duty nursing services are considered to be “portal to portal”, meaning the nurse will meet their student at their home (or at another designated location) at the beginning of the day, and accompany the student throughout the day, including the ride to and from the school location via school bus (as provided by Fairfax County Public Schools). The services will continue at the school location and will remain in effect until the child arrives at their after-school destination. The number of students requiring services may vary during the course of the school year. The typical workday will depend on the students’ needs and may include a shortened school day.
    - a. Transportation Restrictions: Continuous Duty Nurses shall **not transport students in personal or company vehicles**, as full attention must be focused on the students’ care. County-provided transportation is the standard for all students receiving these services. Parent-provided transportation may be used only with prior written approval.
2. Replace Section 21., REPORTS, in its entirety with the revised version included in Attachment A, with changes noted in **bold** font.
3. Replace Appendix B, Continuous Duty Nursing Services Tasks to be Performed, in its entirety with the attached revised version, with changes noted in **bold** font.

All other prices, terms, and conditions remain the same.

ACCEPTANCE:

DocuSigned by:  
 BY: Isha Sharma  
F8A2F337FB124AE  
 (Signature)

\_\_\_\_\_  
 Contracts Manager  
 (Title)

Isha Sharma  
 (Printed)

10/7/2025  
 (Date)

DocuSigned by:  
 For: Derek Solomon  
4B542E278D224BE...  
 Lee Ann Pender, CPPB  
 Director/County Purchasing Agent

DISTRIBUTION:

HD: Kimberly Smith  
 HD: Patricia Trahan  
 HD: Suzanne Lane  
 DFS: Shannon Murphy  
 DFS: Sandra Slappey Brown  
 DFS: Alicia Gallogly

CSB: Jennifer Ahearn  
 CSB: Elif Ekingen  
 Sherriff's Office: Michelle Nelson  
 Sherriff's Office: Shelia Grant  
 Contractor: [healthcare@tscti.com](mailto:healthcare@tscti.com)  
 DPMM: Contract Specialist – Vincenza Githens

**Department of Procurement and Material Management**

12000 Government Center Parkway, Suite 427  
Fairfax, VA 22035-0013

Website: [www.fairfaxcounty.gov/procurement](http://www.fairfaxcounty.gov/procurement)

Phone 703-324-3201, TTY: 711, Fax: 703-324-3228

Contract 4400012383  
Amendment 3  
Attachment A  
Page 2

21. REPORTS:

21.1. The Contractor shall submit the following monthly reports to the County on the 15<sup>th</sup> of each month:

- a. Continuous Duty Nursing notes in accordance with Medicaid standards.
- b. Nurse Supervisor monthly site visits.
  - 1) Site Visit notes to include at a minimum:
    - a) Date of visit
    - b) Name of Nurse Assigned
    - c) Name of Student
    - d) Location of Visit
    - e) Comments
  - 2) If supervisor provides one-on-one care for a student, then nursing notes are required in accordance with Medicaid standards.

21.2. **The Contractor shall submit the following bi-monthly reports to the County on the 1<sup>st</sup> and 15<sup>th</sup> of each month:**

**a. Bi-Monthly Recruitment Log Reporting**

The Contractor agrees to provide documentation of recruitment and placement attempts to the Fairfax County Health Department (FCHD) twice per month as well as on demand within 48 hours using the *FCHD School Health Skilled Nursing Duty Recruitment Log*.

- 1) The *FCHD School Health Skilled Nursing Duty Recruitment Log* is required for any student who has not been assigned a nurse and does not have skilled nursing coverage Monday through Friday. The Contractor must use the FCHD log. Documentation will be due on the 1<sup>st</sup> and 15<sup>th</sup> of each month. Documentation is required for all newly assigned cases until the case is covered by Contractor. After 2 days of nursing absence, the recruitment log should be initiated to document attempts to find coverage.
- 2) **The *FCHD School Health Skilled Nursing Duty Recruitment Log* shall include the status of staffing for:**
  - a) **Newly assigned cases requiring nursing coverage**
  - b) **Existing cases needing coverage due to staff turnover, resignation, or extended leave**
- 3) **Recruitment Log Content Requirements – The *FCHD School Health Skilled Nursing Duty Recruitment Log* shall contain, at a minimum, the following details for each case:**
  - a) **Student's full name (or unique identifier as agreed upon for confidentiality)**
  - b) **School assignment**
  - c) **Date nursing coverage was requested**
  - d) **Current staffing status (e.g., assigned, pending, in recruitment)**
  - e) **Efforts made to recruit and assign nursing staff, including job postings, outreach efforts, and interviews**
  - f) **Anticipated start date for assigned nurse, if applicable**
  - g) **Barriers to recruitment, if any, and proposed resolutions**
- 4) **Submission Process and Deadlines**
  - a) **The recruitment log shall be submitted every 15 days on the [1st and 15th of each month] or the next business day if the due date falls on a weekend or holiday.**
  - b) **The report shall be submitted via secure electronic format or another method approved by FCHD.**

Contract 4400012383  
Amendment 3  
Attachment A  
Page 3

- 5) **Contract Compliance and Enforcement**
  - a) The Contractor shall ensure that all recruitment efforts are conducted in compliance with Fairfax County policies, licensure requirements, and staffing standards.
  - b) The Fairfax County Health Department reserves the right to review, audit, and request additional information regarding staffing efforts.
  - c) Failure to comply with this reporting requirement may result in contract modification, corrective action, or termination.

21.3. The Contractor shall submit the following annual reports to the County:

- a. **BASIC LIFE SUPPORT (BLS) CERTIFICATION REQUIREMENTS**
  - 1) **CERTIFICATION REQUIREMENTS** – Contractor shall ensure that all nursing staff assigned to provide care to school students maintain current Basic Life Support (BLS) certification from the American Heart Association, American Red Cross, or other nationally recognized certifying body.
  - 2) **ANNUAL SUBMISSION** – Contractor shall submit documentation verifying current BLS certification for all nursing staff providing services under this contract to designated Fairfax County Health Department (FCHD) representative, School Health Operations Manager, School Health Management Analyst, and/or the School Health Administrative Team as follows: a) Upon initial assignment of any nursing staff; b) Annually thereafter, no later than August 1st preceding each school year; and c) Within fifteen (15) business days of renewal of any expired certification.
  - 3) **DOCUMENTATION REQUIREMENTS** – Documentation shall include, at minimum: a) Name of each nurse; b) BLS certification number; c) Issuing organization; d) Date of issuance; and e) Expiration date.
  - 4) **COMPLIANCE VERIFICATION** – The County reserves the right to audit the Contractor's records pertaining to BLS certification at any time during the term of the contract. Upon request by the County, the Contractor shall provide the requested records and documentation for review within two business days.
  - 5) **NON-COMPLIANCE** – Failure to maintain or provide documentation of current BLS certification for any nursing staff shall be grounds for immediate removal of such staff from service under this contract and may constitute a material breach of the contract.

21.4. **Medication Authorization Form Submission Requirement**

For Continuous Duty Nursing Services, Fairfax County Public Schools (FCPS) requires student medications be maintained per FCPS and FCHD policies which include completing a *Medication Authorization for Students with Skilled Nursing Service Release and Indemnification Agreement* form for each student served who requires medication on FCPS premises. Contractor will complete this form for each applicable student served.

- a. Contractor shall ensure that the assigned nurse completes and submits the required *Medication Authorization for Students with Skilled Nursing Service Release and Indemnification Agreement* for each student receiving medication administration services.
- b. The *Medication Authorization for Students with Skilled Nursing Service Release and Indemnification Agreement* form must be completed in full and include all necessary documentation, including:
  - 1) The student's name, date of birth, and medical condition(s)
  - 2) The prescribed medication(s), dosage, frequency, and administration instructions
  - 3) The licensed prescriber's signature and authorization
  - 4) Parental or legal guardian consent, as required under FCPS policy

Contract 4400012383  
Amendment 3  
Attachment A  
Page 4

- c. The completed *Medication Authorization for Students with Skilled Nursing Service Release and Indemnification Agreement* form must be submitted to the FCPS school health room:
  - 1) At the beginning of each school year, or
  - 2) Within two (2) weeks of the student's initial enrollment at an FCPS school, if the student starts mid-year.
- d. The Contractor shall ensure timely submission and retain a copy of the form for record-keeping and audit purposes.
- e. Medication Administration Restrictions
  - 1) No medication may be administered by the Contractor's nursing staff unless the completed Medication Form # [Insert Form Number] has been received and approved by the FCPS school health room.
  - 2) In the absence of a completed form, the Contractor's nurses must follow FCPS health and safety policies, including notifying the Fairfax County Health Department and the student's parent or guardian.
- f. Contract Compliance and Enforcement
  - 1) Contractor shall ensure that all nursing staff are trained and informed of the requirements detailed in Section 21.1.d. and understand the process for timely submission.
  - 2) Fairfax County Health Department reserves the right to review submitted forms for accuracy and compliance.
  - 3) Failure to comply with this provision may result in contract modification, suspension of services, or termination.

**21.5. Mandatory Daily Student Absence Reporting Requirement**

- a. Contractor shall ensure that assigned nursing staff report student absences on a daily basis to the Absence Reporting Log which can be found at: <https://fairfaxcounty-639180.workflowcloud.com/forms/0a9e08c7-3b35-4c8b-baa3-11e3136677ca>, School Health Operations Manager, School Health Management Analyst, and/or the School Health Administrative Team and the student's appropriate FCPS school personnel (i.e., school principal, school registrar, school administrative staff).
- b. The absence report must include:
  - 1) Student's full name
  - 2) Date of absence
  - 3) Reason for absence, if known
  - 4) Justification or supporting documentation, when applicable
- c. Submission Process
  - 1) Absence reports must be submitted no later than 10:00am each school day using the FCHD-approved reporting system or Absence Reporting Log method (<https://fairfaxcounty-639180.workflowcloud.com/forms/0a9e08c7-3b35-4c8b-baa3-11e3136677ca>).
  - 2) If the student's absence is due to medical reasons requiring prolonged absence or hospitalization, the Contractor must notify FCHD and FCPS within 1 business day and submit any available medical justification.
- d. Follow-Up on Unjustified or Repeated Absences
  - 1) The Contractor shall work collaboratively with FCHD and FCPS to monitor student attendance trends and report any patterns of unexplained or prolonged absences that may require intervention.
  - 2) In cases where absences may impact the student's health, educational access, or service provision, the Contractor shall assist in coordination with school personnel, healthcare providers, and other relevant parties as needed.

Contract 4400012383  
Amendment 3  
Attachment A  
Page 5

**e. Contract Compliance and Enforcement**

- 1) The Contractor shall ensure that all nursing staff understand and adhere to the daily absence reporting requirement as part of their contractual duties.**
- 2) Fairfax County Health Department reserves the right to audit compliance with this reporting requirement and request additional documentation as necessary.**
- 3) Failure to comply with this provision may result in contract modification, suspension of services, or termination.**

Contract 4400012383  
Amendment 3  
Appendix B  
Page 6

## Continuous Duty Nursing Services Tasks to be Performed

- a. Make individual nursing services available to medically involved school aged children, ages 2 to 21, based on the needs of that student within 21 calendar days of receiving the referral. These one-on-one skilled nursing services shall be provided by an RN or LPN. The Contractor agrees to begin service provision within 21 calendar days of a request, with the understanding that failure to place the requested position within this timeframe will result in additional agencies being offered the case. Each case will then be awarded to the first agency able to place the requested position.
- b. Perform student intake procedures, to include but not limited to the following duties:
  1. Intake Home Visit, which includes explanation of services and expectations to be provided to student families
  2. Obtain Doctor's Medical Orders
  3. Develop a Plan of Care for student based on Doctor's Medical Orders
  4. Assign Nurse to the student.
- c. Provide portal-to-portal nursing services, as defined in paragraph 1.4. of the Special Provisions, for each assigned student. If a student health emergency occurs during the school day and Emergency Medical Staff is notified, then nurse will relinquish care responsibilities upon arrival of the EMS. The nurse shall not accompany the student in transport.
- d. Perform the following primary tasks but not limited to in accordance with the student's plan of care in the classroom with minimum disruption to the educational process:
  1. **Contractor shall ensure that prior to initiating care for any student, a Physician's Plan of Treatment (POT) or equivalent medical care plan is obtained and reviewed to establish a baseline of care. The Physician's Plan of Treatment shall be submitted to Fairfax County Health Department before the start of services. The County reserves the right to review the plan to ensure it aligns with the student's care needs and school health policies, including transportation requirements. The plan shall outline:**
    1. **The student's medical diagnosis and required interventions**
    2. **The scope of nursing services necessary during school hours**
    3. **Any medication administration or emergency care instructions**
    4. **Transportation accommodations, including:**
      - 1) **Special transportation requirements (e.g., wheelchair-accessible vehicle, medical transport)**
      - 2) **Necessary medical equipment to be transported**
      - 3) **The need for a nurse or trained aide during transit**
      - 4) **Emergency protocols while in transit**
      - 5) **Positioning and mobility needs**
    5. **Failure to comply with this requirement may result in contract modification, suspension of services, or termination.**
  2. Travel with the student to and from school and remain with her/him at all times throughout the day.
  3. Perform emergency healthcare procedures when necessary.
  4. Operate and maintain gastric feeding tubes (G-tubes) and jejunostomy feeding tubes (J-tubes).
  5. Perform regular respiratory checks.
  6. Perform tracheotomy suctioning and replacement of tracheotomy should it be necessary.
  7. Perform ventilator management.
  8. Administer medications to student (including by use of a G-tube).

Contract 4400012383  
Amendment 3  
Appendix B  
Page 7

9. Provide injections.
  10. Perform catheterization.
  11. Monitor oxygen saturation levels and administer oxygen as needed.
  12. Care for assigned sick and/or injured student.
  13. Administer IV Infusion.
  14. Document nursing notes on a daily basis in accordance with Medicaid standards and enter the notes into the FCPS system for Medicaid reimbursement. FCPS will provide training on the system and inform the successful offeror which student's services are eligible for reimbursement. Medicaid Memos and Bulletins can be found at: <https://vamedicaid.dmas.virginia.gov/provider/library#gsc.tab=0>.
- e. Provide services that are consistent with the National Standards for Culturally and Linguistically Appropriate Services (CLAS) as identified and defined at <https://thinkculturalhealth.hhs.gov/assets/pdfs/EnhancedNationalCLASStandards.pdf> to include certified interpretation and document translation services, as needed, to communicate with non-native English speaking clients.
- f. Have a nurse supervisor available, via phone, while nurses are working directly with students to provide routine supervision of all continuous duty nurses, to include a quarterly school site visit.
- g. Ensure the student's assigned nurse is available to provide care as scheduled and shall notify the County and student's family if the nurse is not available for any reason. The notification should be given, preferably 24 hours in advance, no later than the next scheduled school day.
- h. Provide backup nursing coverage which is able to meet the needs of the student within three (3) school days. Vendor will provide nursing needed for start of school within 21 calendar days of request.
- i. Provide nursing services until a suitable replacement nurse can be assigned. In the event the Contractor refuses to serve the student or services can no longer be provided, a written notification shall be provided to the County stating the specific reasons. The Contractor must assist with the student's transfer of care to another contractor. The County reserves the right to remove a nurse for any reason. Any request, including parent/guardian request, to change a Contractor must be coordinated with and approved by the HD.
- j. Care Transition:
1. Provide care transition nursing services for a specific child when the current nurse must transition care to a different nurse, within the same company, to include, but is not limited to, observation and demonstration at school, on the bus portal to portal, and when meeting with the family.
  2. Perform Care Transition ranging from short- to long-term coverage of nursing services to students, as authorized by the County. Care Transition shall not replace the requirement to provide a back-up nurse as defined in Paragraph h. above.
  3. Notify the Health Department in advance, defined as no less than three (3) regularly scheduled school days, of the request to implement Care Transition.
- k. Provision of additional skilled nursing services to students enrolled in Fairfax County Public Schools to include, but not limited to, the provisions outlined below:
1. Provide nursing services outside the Fairfax County Public Schools (FCPS) jurisdiction of Fairfax County,

Contract 4400012383  
Amendment 3  
Appendix B  
Page 8

VA and/or outside the routine school day. The services must be in support of a student's Individualized Education Program (IEP) or 504 plan (including but not limited to: band/orchestra trips, athletic events, and scholastic events).

2. Provide an additional nurse on a working on-call basis to be paired with another nurse when applicable. The nurse providing direct services will be the "primary nurse" and the working on-call nurse will be the "secondary nurse" switching roles as needed to provide continuous care to the student.
3. Work with the parent/guardian of the student and FCPS to obtain a signed copy of the FCPS Permission form for the event, and shall forward the signed FCPS permission form and event information to the Fairfax County Health Department (FCHD), to include a request for additional nursing services. The Contractor shall fill out the "Fairfax County Health Department Request for Additional FCPS Nursing Services" when submitting the request (Attachment A).
4. Attend a collaborative planning session, if requested by the Health Department, following trip authorization with the successful offeror Nurse Supervisor, FCPS, and student's parents in attendance.
5. Obtain medical orders from the student's physician to cover the additional services and submit a nursing care plan to meet the needs of the student. Any additional services should be provided to the Fairfax County Health Department two weeks in advance of a day trip or event and 45 days in advance of an overnight trip outside the County. The nursing care plan submission shall include the following pieces of information:
  1. A completed Request for Additional FCPS Nursing Services form, as provided in Appendix D
  2. A detailed copy of the itinerary for overnight trips
  3. The successful offeror's proof of ability to provide nursing services outside the Commonwealth including a Nursing License for the proposed Nurse and appropriate risk management and insurance coverage
  4. Allocation of nursing coverage throughout the duration of event.
  5. A contingency plan for emergency situations involving the student and/or nurse.
  6. Nursing supervisor contact information (name, phone number, and email address) for the nurse(s) responsible for the student.
6. Comply with HIPAA and FERPA guidelines and regulations. **Contractor shall obtain written authorization from the student's parent or legal guardian before requesting or sharing protected health information (PHI) in accordance with HIPAA (45 CFR Part 164) and, where applicable, FERPA (34 CFR Part 99). Contractor is responsible for maintaining proper documentation of consent.**
- l. An inability to place a requested position within 5 working days is a performance issue. A performance improvement plan will be developed by Contractor with approval required by all agencies utilizing the position in question. It is the Contractor's responsibility to address this problem if it arises and propose a solution.
- m. Contractor will provide 4 weeks' notice before a nurse ends an assignment.
- n. **Provision of Locked Medication Box**
  1. **The Contractor shall supply a locked medication box/holder for each student requiring medication administration during the school day and during transportation on an FCPS bus.**

Contract 4400012383  
Amendment 3  
Appendix B  
Page 9

2. **The locked medication box must be durable, tamper-resistant, and compliant with all applicable federal and state medication storage regulations, including but not limited to Virginia Board of Nursing guidelines and Fairfax County Public Schools policies.**
  3. **The locked medication box shall be portable and securely transportable to allow safe handling by the assigned nurse.**
  4. **Nurse's Responsibilities**
    - a) **The assigned nurse shall be solely responsible for the management, security, and administration of all medications stored within the locked medication box.**
    - b) **The nurse shall ensure that all medications are properly labeled, logged, and stored per FCPS and Fairfax County Health Department policies.**
    - c) **The nurse shall maintain a medication administration log, documenting each instance of medication dispensation, in accordance with applicable privacy laws (HIPAA & FERPA).**
  5. **Security and Compliance**
    - a) **Medications must remain in the nurse's possession at all times and shall only be accessed for administration as prescribed in the student's Physician's Plan of Treatment (POT).**
    - b) **Unauthorized access to the medication box by any school personnel, students, or other individuals is strictly prohibited.**
- o. Transportation Considerations for FCPS Bus Travel**
1. **Transportation of Medications on FCPS Buses**
    - a) **The locked medication box must be securely stored during transit and remain under the direct supervision of the assigned nurse.**
    - b) **The nurse shall ensure all medications remain temperature-controlled if necessary, and that emergency medications (e.g., epinephrine, inhalers) are readily accessible in case of an urgent medical event.**
  2. **Nurse Accompaniment on the FCPS Bus**
    - a) **If the student requires medical supervision during transport, the Contractor shall ensure a qualified nurse accompanies the student on the FCPS bus.**
    - b) **The nurse shall adhere to all FCPS transportation policies and collaborate with bus personnel to ensure the safe handling of medical emergencies during transit.**
    - c) **In the event of a medical emergency during transport, the nurse shall follow the emergency response protocols outlined in the student's care plan and coordinate with FCPS transportation and emergency responders as needed.**
  3. **Contract Compliance and Enforcement**
    - a) **The Contractor shall ensure that all nurses assigned to transport and school duties receive training on secure medication handling and transportation policies.**
    - b) **Failure to comply with these provisions may result in contract modification, suspension of services, or termination.**
- p. Compliance with Fairfax County Health Department (FCHD) Policy on Child Protective Services (CPS) Referrals**
1. **Mandated Reporting Compliance**
    - a) **The Contractor shall ensure that all nursing staff comply with the Fairfax County Health Department (FCHD) policy on referrals to Child Protective Services (CPS) in accordance with Virginia state law (Va. Code § 63.2-1509) regarding the mandated reporting of suspected child abuse or neglect.**
  2. **Training and Awareness**
    - a) **The Contractor shall ensure that all nurses assigned to FCPS settings receive annual training on:**
      - 1) **The identification of signs of child abuse and neglect**

Contract 4400012383  
Amendment 3  
Appendix B  
Page 10

- 2) **CPS reporting procedures as outlined in FCHD policy**
- 3) **Confidentiality requirements and the handling of sensitive information**
- 4) **The legal protections and obligations of mandated reporters**

**3. Reporting Process**

- a) **If a nurse suspects a case of child abuse or neglect, they shall immediately follow the CPS reporting protocols as outlined in FCHD policy, which may include:**
  - 1) **Documenting observations and relevant information**
  - 2) **Notifying the appropriate FCHD supervisor or designee before making a formal CPS referral**
  - 3) **Submitting a CPS report to the Virginia Department of Social Services (VDSS) Hotline in accordance with state and county guidelines**
- b) **The Contractor shall ensure that all reports are made in a timely manner and that staff cooperate with any follow-up investigations as required by CPS.**

**4. Confidentiality and Documentation**

- a) **The Contractor shall ensure that all CPS-related records and reports are maintained in compliance with applicable federal and state confidentiality laws, including HIPAA and FERPA, where applicable.**
- b) **Nurses shall document all concerns and actions taken regarding CPS referrals in a secure and confidential manner as per FCHD guidelines.**

**5. Contract Compliance and Enforcement**

- a) **The Contractor shall ensure that all staff acknowledge and adhere to FCHD's CPS referral policy as a condition of their employment under this contract.**
- b) **Fairfax County Health Department reserves the right to audit compliance with CPS reporting requirements and request documentation as needed.**
- c) **Failure to comply with this provision may result in contract modification, suspension of services, or termination.**

**q. Notification Requirement for Emergency 911 Calls**

**1. Immediate Notification to School Health Division (SHD) in the Event of a 911 Call**

- a) **The Contractor shall ensure that its assigned nursing staff immediately notify the School Health Division (SHD) of the Fairfax County Health Department (FCHD) in the event a 911 call is made for a student during the school day due to a medical emergency.**

**2. Notification Protocol**

- a) **The initial notification to SHD shall occur as soon as possible following the emergency event but no later than 30 minutes after emergency services have been contacted.**
- b) **The notification shall be made to the designated SHD representative via phone call and/or secure electronic communication, as per FCHD policy.**
- c) **The notification shall include, at a minimum:**
  - 1) **Student's full name (or unique identifier for confidentiality)**
  - 2) **School location**
  - 3) **Time and reason for the 911 call**
  - 4) **Summary of the emergency situation and actions taken**
  - 5) **Outcome of emergency response (e.g., student transported to hospital, parent/guardian notification, etc.)**

**3. Follow-Up Reporting**

- a) **A written incident report detailing the emergency event shall be submitted to SHD within 24 hours of the 911 call.**
- b) **The report shall include:**
  - 1) **A detailed summary of the incident**

Contract 4400012383

Amendment 3

Appendix B

Page 11

- 2) **Interventions provided by the nurse before emergency responders arrived**
  - 3) **Response actions taken by emergency personnel**
  - 4) **Student's disposition (e.g., transported to hospital, released to guardian, returned to class)**
  - 5) **Any recommendations for follow-up actions or modifications to the student's care plan**
4. **Contract Compliance and Enforcement**
- a) **The Contractor shall ensure that all nursing staff comply with this emergency reporting requirement as part of their contractual duties.**
  - b) **Fairfax County Health Department reserves the right to audit emergency response records and request additional documentation as needed.**
  - c) **Failure to comply with this provision may result in contract modification, corrective action, or termination.**