**From:** Audrey Beard

**To:** DPH-Testimony, Reg (DPH)

**Subject:** "BORN: 244 CMR 3.00,

**Date:** Thursday, September 29, 2016 9:39:27 AM

I am writing with deep concern regarding the upcoming proposal to have unlicensed personnel perform skills for which they are untrained. As a registered nurse, and clinical manager, I am fully aware of the training, education and skill development which precede a nurse obtaining a license from the Board of Nursing. This proposal, I believe, endangers the lives of the most vulnerable sector of the population within our commonwealth. There is a vast divide between a medication pass by an unlicensed care giver and the skillful assessment, education and monitoring for efficacy that is provided by a skilled nurse. Within the Home Care setting, I have witnessed our nurses identify signs and symptoms of impending de-compensation enabling an intervention and resulting in reduced time spent in hospital for our mentally ill patients. Many patients are able to remain in the community by receiving the services of nurses trained and skillful to manage multiple, complex and high risk medication orders, case co-ordinate with other treaters, perform nursing skills safely, and provide much needed education to care givers and patients.

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