Charlotte E. Stepanian, MSN, RN-BC

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To Whom It May Concern re: BORN: 244 CMR 3.00, 6.00, 7.00 and 10.00,

This letter is being written and sent in an effort to voice a strong opposition to the proposed changes to the Board of Registration regulations governing who can administer medications to patients in any healthcare setting with licensure to do so.

A few years ago, I was a member of the workgroup convened by the Board of Registration to fulfill a similar task in the long term and ambulatory setting that reached satisfactory agreement on the necessary education and training for non-medical personnel to be certified to perform this function in that setting.

This currently proposed regulation seeks to broaden the scope of function to **all** health care settings, including acute care. May I refresh your memory back to the year 2000 when the Institute of Medicine released their report entitled “Too Err Is Human”?

That report revealed that approximately 100,000 Americans die each year as the result of medical errors. Medication errors were a significant cause for many of these deaths. Intense remediation and process revisions were instituted then and continue today. However, nearly two decades later, there has been no significant decrease in the number of medical deaths or errors.

Dispensing medications has an art and science attached to each and every medication administered. A brief training program for skill building for this task puts every individual at risk for injury or death without certifiable competency attached to the process. I shudder to consider the consequences of this ill-conceived proposed regulatory change. It must not be advanced or instituted as it endangers the public’s health and wellbeing

I have been a practicing registered nurse here in Massachusetts since 1955 and was employed in the acute care setting for 44 years. Since 1971, I have also been employed by my community as the “Town Nurse” practicing the art and science of Public Health Nursing in order to create a healthy community. I was a founding member actively involved in the creation of the Massachusetts Association of Public Health Nurse and served as its third president. I also currently hold an adjunct faculty role at Endicott College and teach Community Health in the RN to BSN program.

I can be reached at the contact sources listed above.

Respectfully submitted,

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