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**To:** [DPH-Testimony, Reg (DPH)](mailto:RTestimony@MassMail.State.MA.US)

**Subject:** BORN: 244 CMR 3.00, 6.00, 7.00 and 10.00

**Date:** Wednesday, October 05, 2016 5:42:53 PM

I am writing in STRONG opposition to the Board of Registration in Nursing's nursing regulations as drafted.

I am an Associate Professor at the William F. Connell School of Nursing at Boston College. I have been conducting research on nurse staffing and patient outcomes in the Commonwealth for 0ver 20 years. It is my opinion as a clinician and researcher that the proposed regulations allowing unlicensed personnel to administer medication would endanger the safety of patients.

In FY 2014, CHIA reported that one Massachusetts hospital had 5 medication errors resulting in serious injury or death; another Massachusetts hospital had 4 medication errors resulting in serious injury or death; three Massachusetts hospitals had 2 medication errors resulting in serious injury or death; and eleven Massachusetts hospitals had 1 medication injury resulting in serious injury or death. Our research team is currently analyzing factors associated with serious or fatal medication errors by licensed physicians and nurses in Massachusetts hospitals. Although this analysis is in the preliminary stage, it is my expert opinion that the rate of medication errors resulting in patient injury or death will increase if the proposed BRN regulation that removes the prohibition of delegation of medication administration to unlicensed personnel is enacted.

Please approve final regulations that ensure safe medication administration for all patients. Right now, except in two limited circumstances, only licensed nurses can administer medication in every setting. That ensures patient safety because medication administration involves much more than just dispensing medication.It involves knowledge about anatomy, physiology and drug interactions that demand the skilled assessment and monitoring that nurses provide.

Thank you for the opportunity to testify.

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