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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:** Thursday, October 06, 2016 12:35:13 PM

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

The proposed changes could allow the health care industry to start using unlicensed people to administer medication to all patients in all settings. If that happened, hundreds of thousands of patients could be endangered.

In my experience as a Nurse Manager who received daily verbal report on all patients, there was never a day that went by when all medications were administered as originally ordered and dispensed. Sometimes the RN noted a dispensing error and contacted the pharmacy so that the correct medication and dose could be delivered. Sometimes there were errors in the order, which would only be evident to the RN because he or she was looking at the entire treatment regimen. But the most common reason for holding medicine and contacting the prescriber was because of subtle changes in the patient’s clinical status. That type of judgment can only be made by licensed professionals.

They understand the pathophysiology, the effects & side effects of each medication, and the potential for drug to drug interactions.

In 1999 The Institute of Medicine issued a report that revealed how pervasive medical errors are. Since that time, all Health Care Professionals have been charged with making any & all changes in healthcare delivery to reduce risk of error.

Unfortunately, errors that result in patient harm are still far too frequent. It would be a terrible step in the wrong direction to permit unlicensed caregivers to carry out duties that require the knowledge and skill of a licensed professional.

Please approve final regulations that ensure safe medication administration for all patients. Thank you for the opportunity to testify.

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