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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:** Friday, October 07, 2016 9:47:14 AM

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

Even with technological updates, such as bar-code scanning with medication administration, hundreds of thousands of patient deaths related to medication errors occur annually, both, in and out of the acute care setting (Wright, 2013).

Nurses are among the most ethical professionals. Nurses use critical thinking and judgment to perform patient assessments. To allow non-nursing professionals administer medications in the acute care setting, such as Coumadin, Verapamil, Lopressor, Digoxin, and even Immunizations, that require assessment and critical thinking skills (linked with BP, Pulse, lab data, allergies, adverse reactions, monitoring, evaluation, etc...) would be tantamount to negligence.

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.

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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