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

**Cc:** David J Becker

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

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We are writing to oppose the Massachusetts Board of Registration in Nursing’s proposed legislation changes as they are currently drafted. We are a collection of UMASS Boston nursing students who hold strong beliefs regarding the effects of these proposed changes.

We have undergone hundreds of hours of instruction in the study pharmacology (which includes pharmacodynamics and pharmacokinetics), pathophysiology, routine medication calculation exams, as well as specialized training in medication administration. We have, of course, spent hundreds of hours practicing what we’ve learned in clinical settings. Despite this, no one would find it reasonable or safe for a nursing student to administer medications without oversight or a precepting RN at a clinical site. Both conventional wisdom, and especially common sense, tells us that anyone with less than 100% complete RN training and licensing should be given the responsibility of nursing tasks that involve medication administration.

Based on our personal experience and unique perspective as current nursing students, we cannot imagine delegating medication administration to anyone who has not gone through the exact sort of rigorous coursework and clinical hours that we are currently. The fact that we are currently investing our lives into developing ourselves into health care professionals that are proficient and competent enough to safely administer medications, allows us the understanding of how horrifying it is for someone with any less training, what so ever, to be given this enormous responsibility.

One of the most important ongoing roles of a RN is assessment of their patient. This is always tied into medication administration, and the idea that an already overburdened nurse would be expected to assess a patient, during a medication administration that they are not present for, is absurd. A nurse, as opposed to an unlicensed personnel, will be much more prepared to notice subtle changes in a patient’s condition. Unlicensed personnel simply cannot and do not have the depth of knowledge and wealth of experience that a nurse is required to have in order to become licensed.

Considering the extreme financial cost of medication errors in our Commonwealth, it is hard to imagine that any financial savings that the healthcare system benefits from, because of this legislation, could possibly offset the high costs of the errors which would surely follow. If, somehow, healthcare systems did find a net financial benefit, it would likely be on the backs of already overburdened nursing staff. The proposed legislative changes amount to what is essentially the deregulation of healthcare. The likely outcome of this sort of deregulation is to benefit hospital administration, negatively impact nursing staff, and greatly risk the health and safety of patients everywhere in Massachusetts.

As we see it, the anxiety and added responsibility of delegating to unlicensed personnel is unlikely to improve the workflow and stress of RNs. As CNAs we understand that many unlicensed personnel are the most overburdened of all. The idea of asking an inexperienced CNA to take on the complicated and vital task of medication administration when they are already heavily overworked, overwhelmed and stressed, is simply a recipe for disaster.

In conclusion, as student nurses we have grave concerns regarding someday practicing under this proposed legislation. We are simply working far too hard right now, to graduate into an environment where we lay our licenses on the line, and throw our patients to the wolves, for the potential profit of the healthcare system. As CNAs we understand how little time unlicensed personnel have to take on additional responsibilities. Most importantly, perhaps, as healthcare recipients, we understand the value and importance of a registered nurse when it comes to the care received by ourselves and our loved ones. Every patient deserves a nurse. And every nurse deserves to work in a safe and effective healthcare setting.

Thank you for your time, as well as for the opportunity to testify. Sincerely,

-Michael Fratus, Angelina Strachan, David Colbert, Nazifah Namaganda, Chinenye Udenna & Ashley Buccheri