Massachusetts Board of Registration in Nursing

269 Causeway St.

Boston, MA

### RE: 244 CMR 3.00

To Whom It May Concern:

We are writing to oppose the proposed revision of 244 CMR 3.00. As nurses for over 30 years, we are very concerned that public safety is not being considered with an expansion of unlicensed personnel giving medication in all settings. All medication administration requires assessment. Allowing unlicensed personnel to administer meds without the benefit of understanding pathophysiology, possible complications and/or side effects or medication interactions is NOT safe practice. Even though the registered nurse has final say in delegation, there will be enormous pressure to delegate from employers.

We understand that BORN is there to protect the public, but this is NOT protecting our most vulnerable citizens, our chronically ill patients, our children and our elderly. Medication errors are the 3rd leading cause of preventable death in adults. Why would we open this up and NOT have the safest possible regulations in place. Our patients/clients in hospitals, schools and long-term care facilities are more complicated than ever with poly pharm medications.

We would request that the review time be extended for more impact analysis and potential short term and long term risks that these changed regulations may cause.

Thank you for your time.

Respectfully submitted.

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