October 11, 2016

Dear Chair and members of the Board of Registration in Nursing,

I have been a registered nurse for over 40 years, having worked at the bedside, as an LPN instructor and the largest portion in Nursing Staff Development. Most recently I have been on the opposite side of the health care system, advocating for my elderly parents and in-laws and other family members during hospitalizations.

 I attended the hearing on October 4, 2016 and gave a brief testimony. I also had the opportunity to listen to all who testified. It is unfortunate that the BORN did not hold a forum in which the changes could have been presented along with the rationale for the changes and an opportunity to answer questions from the community.

 Having reread the document, I can appreciate the amount of time and effort it must have taken to correct grammatical errors and reorganize the content, which was needed in several places. However, I am very concerned about 244 CMR 3.05(2) (d) and its reference to "Administration of medications only as permitted in M.G.L. 94C and 105 CMR 700.000 *Implementation of M.G.L. c. 94C.".*

As one of many who understood this wording to mean that the licensed nurse could delegate the administration of medications in any health care setting to an UAP, I do hope I am mistaken. However if there is ambiguity in the wording that leads to this misunderstanding then it must be addressed. As Rep. Garlic and several others testified, wording is crucial and it must be correct to avoid misinterpretation.

If the intent is to allow UAPs to administer medications to patients in all health care settings, then this is truly a slippery slope as was stated. As all nurses have learned, and I quote Fundamentals of Nursing, 8th ed. by Potter and Perry, Mosby 2013, " Do not delegate any part of the medication administration process to unlicensed assistive personnel and use the nursing process to integrate medication therapy into care" (p. 582). In addition, nurses learned that "Psychomotor skills represent a small part of medication administration. Patient attitudes, knowledge, physical and mental status and responses make medication administration a complex process." (p. 584)

I respectfully request that:

 1) more time be given to allow feedback from the public and

 2) the BORN present its rationale for the changes in question. .

Sincerely,

Gail S. Bean, BSN, RN

66 Sherwood Ave.

Westfield, MA 01085