## Massachusetts Association of Colleges of Nursing

***The Voice for Baccalaureate and Higher* *Education* *in Nursing in***

***The Commonwealth of Massachusetts***



MACN

**Public Hearing**

# AMERICAN INTERNATIONAL COLLEGE

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# ATLANTIC UNION COLLEGE

# BOSTON COLLEGE

# CURRY COLLEGE

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# EMMANUEL COLLEGE

# ENDICOTT COLLEGE

# FITCHBURG STATE UNIVERSITY

# FRAMINGHAM STATE UNIVERSITY

MASSACHUSETTS COLLEGE OF PHARMACY

& HEALTH SCIENCES

M.G.H. INSTITUTE OF HEALTH PROFESSIONS

NORTHEASTERN UNIVERSITY COLLEGE OF NURSING

Regis College

SALEM STATE UNIVERSITY

SIMMONS COLLEGE

UNIVERSITY OF MASSACHUSETTS/AMHERST

UNIVERSITY OF MASSACHUSETTS/BOSTON

UNIVERSITY OF

MASSACHUSETTS/DARTMOUTH

UNIVERSITY OF

MASSACHUSETTS/LOWELL

UNIVERSITY OF

MASSACHUSETTS/WORCESTER

WESTFIELD STATE UNIVERSITY

worcester state UniVERSITY

**Response to Proposed Rule Changes 244 CMR 3.00, 6.00, 7.00 and 10.00**

This is the response to the above proposed rule changes from the Massachusetts Association of College of Nursing (MACN). The Association is comprised of Deans, Directors or Chairpersons of the baccalaureate and graduate programs of nursing in Massachusetts. One of our goals is to provide leadership on matters pertaining to professional nursing in Massachusetts.

MACN welcomes the opportunity to provide written responses from the academic leaders of baccalaureate and graduate programs to the proposed changes to **244 CMR 3.00, 6.00, 7.00 and 10.00**. The Association welcomes many of the proposed changes that will bring our regulatory framework more in line with current educational and clinical practices. At the same time, many of the proposed revisions also simplify the BORN regulations and further clarify their interpretation.

With the proposed regulation changes, however, are provisions the academic leaders of MACN are compelled to respond to. The following sections outline those provisions that raise concern.

The proposed regulatory revisions would allow the delegation of medication to unlicensed assistive personnel in all settings. It is unclear why this regulation change is needed given that delegation, in any context, can lead to increased risk of medication errors, harm to patients and medication diversion. MACN members are concerned that allowing the administration of medications will put pressure on RNs to agree to delegation behaviors and that these will extend into community-based settings, in particular psychiatric half-way houses and rehabilitation facilities. While members of MACN realize there are many settings that require the administration of medications, we are of the firm belief that this critical task must not be delegated.

Sincerely,

Stephen J. Cavanagh, RN, PhD, FACHE, FAAN

Professor and Dean, UMass Amherst College of Nursing

President, Massachusetts Association of Colleges of Nursing