**From:** Kimberly Wooten

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

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

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

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.

I personally have a child with autism that was hit by a car in another state and sustained grade 2 spleen and liver lacerations and required EMS to put two large bore ivs because they were concerned that he was going into hypovolemic shock. My son was 9 say the time and was unable to explain what happened and was unable till emote to pain other than to say out hurt slightly and pointed to his abdomen. At the time. This occurred I was an RN At Tewksbury Hospital and was at the drive in with my family for the evening. Although I had told the doctor several times that if he is complaining of pain it's 10/10 because he had a very high pain tolerance. The nurse convinced the doctor into having a CT scan done which determined the inquiries. The doctor was amazed by the injuries because my son wasn't giving any sign he was in so much pain. Three doctor stated he's had adults that would be crying and yelling by now. When they administered morphine to my son all here said was ahh that's better. My son's father had very little medical background didn't, understand the full gravity of the situation until I explained it to him. All of which I wouldn't have known or understood without my nursing education.

I currently, work in home care and have seen many patients with psychiatric illnesses as well,as medical and understand how much more important it is to be able to use my assessment skills. These are individuals that are already compromised and often have no one to assist them with medications or advocate for the services they need. The position I hold at my company is Utilization Review for managed care insurance companies and they are already saying on a nearly daily basis that medication administration is not a skill. If the language in this bill is put through as it currently stands I can guarantee there will be automatic denials of skilled nursing visits for these very compromised individuals. Leading to unnecessary hospitalizations that can be avoided by having nursing in place with having these clients remain in the community.

Thank you for the opportunity to testify. Kimberly A. Wooten,RN

Kimberly Wooten 6 Maxwell St

Haverhill, MA 01832