

Dipasquale, Anita

Re: 4723-9-13

From: OBN Rules
Sent: Wednesday, September 11, 2024 10:23 AM
To: sue keys
Cc: OBN Rules
Subject: RE: Review of Packet 3 Comments- Rule #4723-9-13- concerning Medicated-assisted treatment or MOUD

Thank you for your comments. They will be provided to the Board's Advisory Group on Rules in advance of its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
8995 East Main Street
Reynoldsburg, Ohio 43068
www.nursing.ohio.gov
Customer Service: 614-466-3947
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From: sue keys <keysandkeys_@hotmail.com>
Sent: Tuesday, September 10, 2024 7:40 PM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: Review of Packet 3 Comments- Rule #4723-9-13- concerning Medicated-assisted treatment or MOUD

To: OBN Advisory Group on Rules,

To follow and clarify the rule, I would suggest the definition for (7) "Medications for Opioid Use Disorder" or "MOUD" which refers to medications approved by the FDA for the treatment of opioid disorder, be moved to where the abbreviation for MOUD is used for the first time.

This will help readers to identify the abbreviation term MOUD more easily.

Thank you for your attention concerning this matter.

Loretta Ulrey-Keys, MS, RN

Re: 4723-9-13

Dipasquale, Anita

From: OBN Rules
Sent: Tuesday, September 10, 2024 2:46 PM
To: Zehala, Anita M.; OBN Rules
Subject: RE: Packet 3 comments - Rule 4723-9-13 – Medication-assisted treatment.

Thank you for your comment. It will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
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From: Zehala, Anita M. <zehala.3@osu.edu>
Sent: Tuesday, September 10, 2024 12:40 PM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: Packet 3 comments - Rule 4723-9-13 – Medication-assisted treatment.

To the OBN Advisory Group on Rules,

To be uniform with the rest of the rule, I suggest that (A) Definitions; [(7) "Medications for Opioid Use Disorder" or "MOUD" refers to all medications approved by the FDA for the treatment of opioid use disorder] be moved to before the abbreviation MOUD is used for the first time – [(5) "Induction phase" means..].

Doing this will help to avoid confusion when reading through the definitions.

Thank you for your attention to this concern,

Anita Zehala, MS, RN, APRN-CNS



Anita Zehala, MS, RN APRN-CNS, CNE

Instructor of Clinical Practice

College of Nursing

371 Newton Hall, 1585 Neil Ave., Columbus, OH 43210

614-292-0987 Office

zehala.3@osu.edu

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Re: CH 9

Dipasquale, Anita

From: OBN Rules
Sent: Tuesday, September 10, 2024 4:34 PM
To: TJ waltmire
Cc: OBN Rules
Subject: RE: Comment on draft [Packet 3/CH 9]

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
8995 East Main Street
Reynoldsburg, Ohio 43068
<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.nursing.ohio.gov%2F&data=05%7C02%7Crules%40nursing.ohio.gov%7Ceb90330c44ea4b623d1908dcd1d7ea89%7C50f8fcc494d84f0784eb36ed57c7c8a2%7C0%7C0%7C638615972475974987%7CUnknown%7CTWFpbGZsb3d8eyJWljoImMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=d7zRu5WTxskkWqo1bGtrd22ewGt2S2oufCfrOm8Mhks%3D&reserved=0>
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-----Original Message-----

From: TJ waltmire <tjrn45891@gmail.com>
Sent: Wednesday, August 28, 2024 8:10 PM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: Comment on draft

I would like to see full prescriptive authority added to the bill. I am a fairly new Nurse Practitioner who has hopes of bridging the gap in healthcare between the underinsured and disproportionate population. However, the length of time and cost associated with starting a practice, along with finding a collaborator who has reasonable cost is extremely limited. Imposing additional challenges that I must face in order to help the less fortunate. Due these hurdles I have been forced to seek employment with a company, meanwhile my hometown natives go without proper care. Along with me being in default of a contract with HRSA since I was unable to find employment as a FNP or open my own practice. The challenges providers are faced with leave little to no room to help those we truly want to reach. I urge you on behalf of those wanting to help reach patients who would not have access to healthcare please consider adding full prescriptive

authority to the “list of things to change” for the sake of healthcare and provider frustrations of exhausting all ends trying to do what needs to be done to make things happen without an end in sight. Thanks in advance.

Yours truly,
Tarra Waltmire MSN, APRN, FNP-BC

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Re: CH9

Dipasquale, Anita

From: OBN Rules
Sent: Thursday, September 12, 2024 1:59 PM
To: Latona Bowkamp
Cc: OBN Rules
Subject: RE: MAT and counseling

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
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-----Original Message-----

From: Latona Bowkamp <Workaholic_RN@yahoo.com>
Sent: Thursday, August 29, 2024 9:59 AM
To: CSIPublicComments <CSIPublicComments@governor.ohio.gov>; OBN Rules <rules@nursing.ohio.gov>
Subject: MAT and counseling

MAT (medication assisted treatment) is successful in reduction of SUD when provided in combination with counseling. It is my observation that x-waiver was removed so the treatment can be more readily available.

To tighten counseling restrictions while opening the ability to provide MAT still restricts the ability for the patient to obtain treatment. There is a shortage of mental health providers.

Can counseling be provided by FNP, ACNP/geriatric as well??

Dipasquale, Anita

Re: CH 19

From: miriam cartmell <miriam.cartmell@hotmail.com>
Sent: Tuesday, September 10, 2024 7:57 PM
To: OBN Rules
Subject: Re: Feedback

Thank you for the explanation.

Miriam

From: rules@nursing.ohio.gov <rules@nursing.ohio.gov>
Sent: Tuesday, September 10, 2024 4:46 PM
To: miriam cartmell <miriam.cartmell@hotmail.com>
Cc: rules@nursing.ohio.gov <rules@nursing.ohio.gov>
Subject: RE: Feedback

Thank you for your comment. It will be provided to the Board's Advisory Group on Rules in advance of its September meeting. The program name is established in the law enacted by the Ohio Legislature. The rules are being proposed to implement the law as enacted. Thank you.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
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From: miriam cartmell <miriam.cartmell@hotmail.com>
Sent: Wednesday, August 28, 2024 8:36 PM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: Feedback

Why would you name a recovery program with the same name as an Ohio law that already exists?

The **Ohio Safe Haven Law**, enacted in 2001, allows parents to legally abandon a newborn within 72 hours of the child's birth if they are unable to care for the baby. It provides a safe and anonymous way for parents to surrender their newborn without fear of prosecution

Miriam Cartmell

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Re: CH 19

Dipasquale, Anita

From: OBN Rules
Sent: Wednesday, September 4, 2024 5:26 PM
To: Jaime Kist
Cc: OBN Rules
Subject: RE: Proposed rule changes to safe haven - PACKET 3

Thank you for your email. The Safe Haven rules are found in proposed Chapter 4723-19. They are found at pages 42-48 of the PDF available on the Board website (once you are on the website, click on the highlighted "here" within the message): <https://nursing.ohio.gov/about-us/news/all-news/rules-packet-3>

Or, you can access them here at pages 42-48: https://dam.assets.ohio.gov/image/upload/nursing.ohio.gov/uploads/Packet_3_PDF.pdf

Please feel free write back if you have any difficulty accessing them.

Thank you,
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From: Jaime Kist <jaimekist@yahoo.com>
Sent: Wednesday, September 4, 2024 3:22 PM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: Proposed rule changes to safe haven

Can you direct me to the exact spot where I can find the proposed changes to Safe Haven?
Thank you so much for your help.

*Blessings,
Jaime Kist*

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Re CH 27

Dipasquale, Anita

From: OBN Rules
Sent: Wednesday, September 11, 2024 9:08 AM
To: Erin Hart
Cc: Mandy Smith; Pete VanRunkle; OBN Rules
Subject: RE: Chapter 4723-27, Packet 3 Comments
Attachments: OHCA OBN Medication Aide Rule Comments.docx

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September 19, 2024 meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
8995 East Main Street
Reynoldsburg, Ohio 43068
www.nursing.ohio.gov
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From: Erin Hart <ehart@ohca.org>
Sent: Wednesday, September 11, 2024 8:11 AM
To: OBN Rules <rules@nursing.ohio.gov>
Cc: Mandy Smith <msmith@ohca.org>; Pete VanRunkle <pvanrunkle@ohca.org>
Subject: Chapter 4723-27, Packet 3 Comments

Good morning

Please find attached comments from the Ohio Health Care Association on Chapter 4723-27 | Medication Administration by Certified Medication Aides.

We appreciate the opportunity to participate in stakeholder involvement and rulemaking with the Board of Nursing. Please let us know if you have any questions.

Erin Hart

Strategy Director

Ohio Health Care Association

(614) 420-0291

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Thank you for the opportunity to comment on Chapter 4723-27, Medication Administration by Certified Medication Aide. The Ohio Health Care Association represents nearly 600 skilled nursing facilities and over 300 residential care facilities in Ohio. Many member organizations employ medication aides and administer medication aide training programs. We support the changes enacted by Senate Bill 144 in the 135th General Assembly, which we feel will increase access to Certified Medication Aide pathways for direct care workers.

Many of our comments reflect the legislative intent in Senate Bill 144 to more closely align the regulation of certified medication aides with the regulation of certified nurse aides instead of licensed nurses. Our additional recommendations on the draft rule are:

- 4723-27-01 (C) "As-needed medication" means any medication that is not scheduled to be administered at a routine time, but is given in response to a resident's complaint or expression of discomfort or other indication of a specified condition.
The rule no longer references "as-needed," and this definition is no longer needed.
- 4723-27-01 (DD) Senate Bill 144 includes a definition of Prescription medication under 4723.63 "means a medication that may be dispensed only pursuant to a prescription.". We suggest adding this under (DD) of this rule.
- 4723-27-02 (F)(4) "Administer any medication without the task having been delegated by a nurse."
In other sections of this rule, the word "delegate" has been changed to "supervise" to comply with the language from Senate Bill 144.
- 4723-27-02 (F)(5) "Administer medications to pediatric residents; or". There is no such restriction in statute.
- 4723-27-03 "A registered nurse or a licensed practical nurse acting at the direction of a registered nurse, who provides nursing care to residents in nursing homes or residential care facilities, may delegate supervise the task of medication administration to by a certified medication aide according to section 4723.67 of the Revised Code and this chapter."
We believe the word "delegate" should be struck as it is being replaced with "supervise".
- 4723-27-04 (A)(3) The applicant must submit a completed "Medication Aide Application".
Amend to "Certified Medication Aide Application" to be consistent with 4723-27-05(A)(2)(a) and with the new "certified medication aide" designation.
- 4723-27-04 (C) "If a medication aide certificate is issued by the board on or after February first of an even-numbered year, the certificate shall be valid, unless the certificate is made inactive or if disciplinary action has rendered it invalid, through April thirtieth of the next even-numbered year." Senate Bill 144 has no provisions regarding disciplinary action against CMAs, aside from the pre-existing abuse registry statute, so we recommend removing the words "or if disciplinary action has rendered it invalid." Alternatively, a specific reference to the abuse registry could be included; although technically, an aide doesn't lose their certification by being placed on the registry, it renders them unable to use it to work in long-term care.
- 4723-27-07(C)(5) The supervised clinical practice component shall be provided in nursing homes that the Ohio Department of Health has found to be free from deficiencies related to the administration of medications in the two most recent annual surveys or in residential care

facilities that the Ohio department of health has found to be free from deficiencies, related to the administration of medications and the provision of skilled nursing care, in the two most recent annual surveys.

The Ohio Department of Health has been working through a backlog of surveys for RCFs and SNFs since the COVID19 pandemic. Currently, 58% of surveys are more than 15 months from their last average survey, and 25.5% are over 24 months overdue. The two most recent surveys could be over 4-6 years. The requirement should be that the facility has no active survey issues and is compliant. Our suggested language reads:

The supervised clinical practice component shall be provided in nursing homes that, at the time of application, are in compliance with licensure and certification regulations related to the administration of medications or in residential care facilities that, at the time of application, are in compliance with licensure regulations related to the administration of medications.

- 4723-27-08(B)(6) Basic pharmacology, drug classifications and medications affecting body systems, twelve hours, including:
The hourly requirement has been removed from all other curriculum-related topics in this section. This reference to a specific number of hours should be removed to balance the curriculum with the different topics.
- 4723-27-08 (C)(3) While engaged in medication administration, a student shall be under the one-on-one direction and supervision of a nurse.
This creates logistical challenges for programs teaching multiple medication aides in a single facility. If there are multiple students, there would need to be a one-to-one match for the instructor, which is not comparable to other nurse aide training program protocols. We suggest revising this to say, "While engaged in medication administration, a student shall be under the direct supervision of a nurse."
- 4723-27-09 "Disciplinary actions; investigations"
As previously noted, there are no provisions in SB 144 regarding disciplinary actions against CMAs. Instead, the statute calls for OBN to create a registry for them. We suggest titling this rule "Certified Medication Aide Registry" and removing references to disciplinary actions (e.g., paragraph (A)) and investigatory/enforcement activities (e.g., paragraphs (D) to (G)). A description of the registry should replace those paragraphs and how people come on, stay on, or are taken off of the registry.

We are happy to discuss any of these items in greater detail. Thank you for your consideration.

Erin Hart
Strategy Director
Ohio Health Care Association

Re: CH 27

Dipasquale, Anita

From: OBN Rules
Sent: Tuesday, September 10, 2024 4:39 PM
To: Kelli
Cc: OBN Rules
Subject: RE: Proposed changes to Revised codes Medication Aide Programs

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
8995 East Main Street
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From: Kelli <Kelli@kimesnursingandrehab.com>
Sent: Tuesday, September 3, 2024 2:12 PM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: Proposed changes to Revised codes Medication Aide Programs

Hello,

I would like to suggest removing the stipulation that Medication Aide training programs clinical sites must be free of medication errors for the previous 2 annual surveys. Our facility is in rural southeastern Ohio. It is very difficult to find nurses who want to work in a nursing home. Our facility would like to start a Medication Aide Training program. There are 9 nursing homes in our area within driving distance that were potential clinical sites, however none of them are medication error free.

In addition, medication errors in a facility DOES NOT restrict colleges from training Nursing Students in the facility. That seems an unfair rule for the Medication Aide Programs.

Thank you for your time and consideration,

Kelli Wilson RN BSN
Clinical Compliance Specialist
Kimes Nursing & Rehab Center
740-593-3391 Phone
740-594-1632 Fax

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Re: CH27

Dipasquale, Anita

From: OBN Rules
Sent: Thursday, September 12, 2024 1:57 PM
To: kjwilson@email.com
Cc: OBN Rules
Subject: RE: [4723-27] Packet 3

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
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<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.nursing.ohio.gov%2F&data=05%7C02%7Crules%40nursing.ohio.gov%7C28fd4bcd73c14a5134d208dcd3544fed%7C50f8fcc494d84f0784eb36ed57c7c8a2%7C0%7C0%7C638617606269843899%7CUnknown%7CTWFpbGZsb3d8eyJWljoImMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=MJmsBcoKtUbORjM2OrHIPdSygk7JBHz3%2FIXIDJNRMyU%3D&reserved=0>
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-----Original Message-----

From: kjwilson@email.com <kjwilson@email.com>
Sent: Thursday, August 29, 2024 11:22 AM
To: OBN Rules <rules@nursing.ohio.gov>
Subject:

Regarding:
Chapter 4723-27, Medication Administration by Certified Medication Aide

I would suggest to remove the rule that requires a facility to be free of medication related citations. This is not required by the Board of Nursing for Nursing students. This requirement makes it difficult for any facility to have a Medication Aide Program.

Re: CH 27

Dipasquale, Anita

From: OBN Rules
Sent: Thursday, September 12, 2024 2:02 PM
To: Nicole Hernandez
Cc: OBN Rules
Subject: RE: PACKET 3/ 4723-27-02 & -03

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
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From: Nicole Hernandez <nicnac92810@gmail.com>
Sent: Thursday, August 29, 2024 11:01 AM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: PACKET 3/ 4723-27-02 & -03

Medication aides I do not believe by no means should be administering ANY opioids, narcotics, or drugs that need locked up or have any severe potential of dependency. I feel as a whole hearted dedicated nurse for the quality of life of another life, med techs/ med pass aides/ all the other names, have such a short jam packed quick test to learn meds and that's it. Us nurses learn Psychology, Anatomy more in depth and we currently work with all medications to visually see the effects (good/bad) and learn through working with CNP's or MD's how to course correct meds. Just like BP meds, bp should be checked every time prior to admin if the med effects more than heart rate.

I feel that putting a persons life in jeopardy just to save a buck by not paying a nurse wage and just pay an aide a little more is an awful medical practice. I have heard so many med error horror stories that I believe med techs in my own personal opinion or cheap labor hoping for equal quality of care. As a nurse,

we vow to be an advocate for those under our care and those in our community. Not all med techs are oblivious, just as many nurses I worked with are oblivious, but making the option available (med tech) is truly not improving the quality of care for those we vowed to be advocates for.

But as for administering this medication or any similar, I think is not appropriate or in the best interest of each individual who will receive it. Our patients lives depends on lots of the medication we administer.

Thank you for the opportunity to voice!

Nicole Hernandez LPN

Sent from Gmail Mobile

Re: CH 27

Dipasquale, Anita

From: OBN Rules
Sent: Thursday, September 12, 2024 2:01 PM
To: Catherine Parker
Cc: OBN Rules
Subject: RE: Packet 3 Rule 4723-7

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
8995 East Main Street
Reynoldsburg, Ohio 43068
www.nursing.ohio.gov
Customer Service: 614-466-3947
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From: Catherine Parker <Catherine.Parker@walnuthillsliving.org>
Sent: Thursday, August 29, 2024 10:57 AM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: Packet 3 Rule 4723-7

Recently I had a surveyor question and cite on medication aides. There needs to be some sort of verbiage on the fact they can chart in the residents chart, what notifications they can or cannot do for families and physicians and scope of practice.

Thank you for all you do!

*Catherine Parker RN
Director of Nursing*

Walnut Hills Retirement Community
P.O. Box 127
4748 Olde Pump Street

Walnut Creek, OH 44687
(330)893-3200

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Re: CH 27

Dipasquale, Anita

From: OBN Rules
Sent: Tuesday, September 10, 2024 3:24 PM
To: Ciara Clarke
Cc: OBN Rules
Subject: RE: Ohio Board of Nursing Chapter 4723-27, Certified Medication Aide Packet 3 Public Comments

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting. The draft proposed changes to the administrative rules, Chapter 4273-27, OAC, including those changes you reference, are intended to implement the law enacted by the Ohio General Assembly (135th). You can access SB144 through the link below. (Relevant portions begin at page 34.)

https://search-prod.lis.state.oh.us/api/v2/general_assembly_135/legislation/sb144/05_EN/pdf/

Thank you,

Anita A. DiPasquale, JD

Advisory Attorney

Education, Practice, & Licensure

OHIO BOARD OF NURSING

8995 East Main Street

Reynoldsburg, Ohio 43068

www.nursing.ohio.gov

Customer Service: 614-466-3947

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From: Ciara Clarke <ciaraclarke021@gmail.com>

Sent: Friday, September 6, 2024 9:21 AM

To: OBN Rules <rules@nursing.ohio.gov>

Subject: Ohio Board of Nursing Chapter 4723-27, Certified Medication Aide Packet 3 Public Comments

Dear Ohio Board of Nursing,

I'm reaching out to offer comments on the Ohio Board of Nursing's proposed changes to Ohio Revised Code (ORC) Chapter 4723-27 regarding Certified Medication Aides. I appreciate this opportunity to offer

comments and feedback as a licensed Ohio (and multistate) registered nurse (RN) and patient advocate. My comments are as follows:

ORC 4723-27-02(C)(1) - medications containing a schedule II controlled substance, as defined in section 3719.01 of the Revised Code is struck out. Why is this restriction being removed for certified medication aides? Will training programs be required to properly educate their students of the risks of controlled schedule II substances? These highly addictive substances like Hydromorphone (Dilaudid), Oxycodone (Oxycontin), Fentanyl, Amphetamine, etc can cause severe respiratory effects if the person receives the medication incorrectly or shouldn't receive the medication due to their vital signs (blood pressure, heart rate, respirations, etc). Will the nurse assess the patient prior to the aide giving these medications? It's very risky if aides can give these out because the physician ordered it without a proper nursing assessment being propered.

ORC 4723-27-08(C)(1): "The supervised clinical practice component shall consist of not less than 16 hours (as the previous 40 clock portion was struck out) in the administration of medication, and shall be conducted under the direction and supervision of a nurse.

Why was the supervised clinical hours portion cut by more than 50%? Shouldn't the board want all medication aides to have at least 40 hours of supervised administration so the students can have a variety of clinical experience? 16 hours is not enough time to get the actual experience of going through the medication administration process with a variety of medications and patients. We should want the students to have confidence in being able to perform their skills and not feel thrown to the wolves once they get a job. I'm unsure who proposed this cut or if this cut is being done because schools always offer more than 16 hours, but I think this can cause more medication errors if students don't get enough clinical experience in school.

ORC 4723-27-08(E)(1-3), (F), and (G)(1-3): based on my review, it appears that the medication skills checklist will no longer be required. Also, if a student doesn't complete the skill in school, they no longer have to tell their supervising nurse when they gain employment? These changes don't make sense to me as well. A skills checklist is important for the student to know the skills they've been taught and successfully completed. It's important for future employers to have an honest understanding of what their new employee may or may not have. Yes, one can argue that this is burdensome and the employers should have their own skills check-offs, but what if they don't? What if they ask the new employee to tell them what they know or don't know and the new employee isn't honest or is afraid to tell the truth due to losing their job or being treated poorly?

Patients are the main concern. Less training and less accountability can lead to more medication errors. More medication errors equals more chances of patient harm and even death. I hope the board and legislature are aware of these risks if they implement these changes.

Sincerely,
Ciara Decot
ciaraclarke021@gmail.com
Licensed Ohio (and multistate) Registered Nurse

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Re: CH 27

Dipasquale, Anita

From: OBN Rules
Sent: Tuesday, September 10, 2024 4:27 PM
To: Edward Belville
Cc: OBN Rules
Subject: RE: Nursing

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,

Anita A. DiPasquale, JD

Advisory Attorney

Education, Practice, & Licensure

OHIO BOARD OF NURSING

8995 East Main Street

Reynoldsburg, Ohio 43068

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.nursing.ohio.gov%2F&data=05%7C02%7Crules%40nursing.ohio.gov%7Ce8edf869ea1e4074b19208dcd1d6e8a1%7C50f8fcc494d84f0784eb36ed57c7c8a2%7C0%7C0%7C638615968150185485%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=AUg5PJnSmZZHBUA5smUjftcnfoKWCsDXMGHJ852p%2Bzl%3D&reserved=0>
Customer Service: 614-466-3947

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-----Original Message-----

From: Edward Belville <weldingrn@gmail.com>

Sent: Wednesday, August 28, 2024 4:55 PM

To: OBN Rules <rules@nursing.ohio.gov>

Subject: Nursing

Better leave the meds to nurses. That's all I have to say!

Sent from my iPhone

Re: CH 27

Dipasquale, Anita

From: OBN Rules
Sent: Tuesday, September 10, 2024 4:48 PM
To: Donna Starkey
Cc: OBN Rules
Subject: RE: Packet 3.

Thank you for your comments. They will be provided to the Board's Advisory Group on Rules in advance of its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
8995 East Main Street
Reynoldsburg, Ohio 43068
www.nursing.ohio.gov
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From: Donna Starkey <dstarkey7171@gmail.com>
Sent: Wednesday, August 28, 2024 4:43 PM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: Packet 3.

Medication Aides: for the last two years, until July, I have been employed by Companions of Ashland as an educator of Medication Aides. When I first took the job I wasn't sure I necessarily agreed with this type of education for aides. Once I delved into and refreshed myself with the material, I was somewhat surprised that such an intensive class was given in such a brief amount of time. In each group, as in any class that's taught, there are those looking for a good education and studying hard and inversely those who are looking for a quick class for a higher salary. Our success rate was good and I found myself looking for ways to teach that made studying such a large amount of material easier and more manageable. Many of the students doing clinicals on site were (are) having to deal with prejudice from the professional nurses they work with who feel that aides are being handed by the state the right to give

medication without enough education. My suggestion was that they are unfamiliar with the process by which they're certified and to tell them. Over and over they are having to overcome this obstacle and lack of respect. It's my opinion that in one of the mandatory statements issued by the state, that nurses are made aware of the processes that Med Aides go through. I, myself, don't remember ever studying such a rigorous curriculum of medications but rather learned them one by one (less intensely) while studying disease processes.

Please consider educating our nurses about this relatively new position which certainly helps institutions as well as management of rising health care for the aged.

Donna Starkey RN.

Re: CH 27

Dipasquale, Anita

From: OBN Rules
Sent: Thursday, September 12, 2024 1:51 PM
To: Gray, Kaci
Cc: OBN Rules
Subject: RE: Medication Aide Changes

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
8995 East Main Street
Reynoldsburg, Ohio 43068
www.nursing.ohio.gov
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From: Gray, Kaci <KGray@continuinghc.com>
Sent: Thursday, August 29, 2024 7:58 AM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: Medication Aide Changes

I personally set up my company's Medication Aide training program and I personally teach and administer the classes. I am excited for the change to allow them to administer schedule II and insulin in the manner described but it frightens me to think that their training would be cut so short. In my opinion, with the addition of these two items to their scope of practice, the training should be increased.

*Kaci Gray RN, CDCA
STNA/Med Aide/CPR instructor
501 Pinecrest Drive
Beverly, OH 45715
740-984-4262- facility
740-984-4262 fax*

Re: CH 27

Dipasquale, Anita

From: OBN Rules
Sent: Thursday, September 12, 2024 1:54 PM
To: Wood, Elizabeth
Cc: OBN Rules
Subject: RE: PACKET-3 ; Chapter 4723-27-01 through Chapter 4723-27-11

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
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From: Wood, Elizabeth <Elizabeth.Wood@UHhospitals.org>
Sent: Thursday, August 29, 2024 7:59 AM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: PACKET-3 ; Chapter 4723-27-01 through Chapter 4723-27-11

From: Wood, Elizabeth
Sent: Thursday, August 29, 2024 7:57 AM
To: obnnews@nursing.ohio.gov <obnnews@nursing.ohio.gov>
Subject: PACKET-3 ; Chapter 4723-27-01 through Chapter 4723-27-11

To Whom it may concern:

RE: the implementation of "Certified" Medication Aides... This is a HORRIBLE idea. The premise of 3-4 years in a certified Nursing school or College is the reason nurses have SAFELY been administering medication to patients since the creation of the Ohio Board of Nursing. This is putting patients at risk, and Nurses license's at risk. Please do not implement this amendment. I highly reject this idea/plan.

Sincerely, Elizabeth Wood, RN

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MISC.

Dipasquale, Anita

From: OBN Rules
Sent: Tuesday, September 10, 2024 4:41 PM
To: Melissa Kiko
Cc: OBN Rules
Subject: RE: Suggestion

Thank you for your comments. They will be shared with the Board's Advisory Group on Rules at its September meeting.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
8995 East Main Street
Reynoldsburg, Ohio 43068
www.nursing.ohio.gov
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From: Melissa Kiko <melissakiko1@gmail.com>
Sent: Sunday, September 1, 2024 9:05 AM
To: OBN Rules <rules@nursing.ohio.gov>
Subject: Suggestion

Hello,

I would like the board to consider changing the rule that says RN's can not pronounce death on a patient who is a full code. I feel RN's have been provided the proper education and training to be able to make this call. EMT's have less education but to my understanding they are able to pronounce death on any patient regardless of code status. If in fact RN's have not been educated to perform this task could you incorporate it into the nursing program so this can be allowed sometime in the future. Thank you for your time and consideration.

Melissa Kiko, RN DON

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MISC.

Dipasquale, Anita

From: OBN Rules
Sent: Tuesday, September 10, 2024 4:44 PM
To: Tamara Maberry
Cc: OBN Rules
Subject: RE:

No content was received. If you are trying to comment on a rule, please write again directly to OBN Rules rules@nursing.ohio.gov Thank you.

Thank you,
Anita A. DiPasquale, JD
Advisory Attorney
Education, Practice, & Licensure
OHIO BOARD OF NURSING
8995 East Main Street
Reynoldsburg, Ohio 43068
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From: Tamara Maberry <tamaramaberry@gmail.com>
Sent: Wednesday, August 28, 2024 12:46 PM
To: OBN Rules <rules@nursing.ohio.gov>
Subject:

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