



Representing Quality Health Care Homes

October 31, 2014

Linda Davidson, Executive Director
Board of Nursing, Office of Professional Regulation
89 Main St., Fl. 3
Montpelier, Vermont, 05620-3402

Re: Proposed Changes to Board of Nursing Administrative Rules

Dear Ms. Davidson:

I am submitting these comments to the proposed changes to the Board of Nursing Administrative Rules on behalf of the Vermont Health Care Association (VHCA). VHCA is the non-profit trade organization representing long-term care facilities, including nursing homes, residential care homes, assisted living residences and independent living facilities. VHCA has reviewed the proposed rules and directs its comments specifically to Part 3, Medication Nursing Assistants. VHCA supports the proposed provisions contained in Part 3 of the proposed rule changes. VHCA has advocated for a number of years for development of a medication nursing assistant (MNA) program for nursing homes that will improve quality of care, ensure resident safety, and provide professional development opportunities for licensed nursing assistants (LNAs).

MNAs will enhance quality initiatives in nursing homes as they continue to implement culture change. For example, nursing homes will have access to additional resources to administer medications on a schedule that suits the resident, rather than on a schedule that suits the busy nurse. At the same time, nursing homes will have opportunities to more effectively utilize LPN and RN resources to improve care. Published literature supports the following conclusions: MNAs can be utilized safely and effectively; overall facility staff satisfaction improves with utilization of MNAs; there is no increase in medication errors or diversion with utilization of MNAs. Further, this endorsement will provide our hard-working LNAs with a much needed career ladder, and opportunities for professional growth.

The proposed rules reflect the input of many stakeholders with diverse perspectives. While the proposed rules contain some provisions that VHCA feels are more stringent than necessary, VHCA believes that the proposed rule provisions as a whole strike a balance that will adequately advance these goals.

Sincerely,

Kirt Sampson

President

Vermont Health Care Association