

February 25, 2024

Sarah S. Benson  
Deputy Commissioner NYS Education Department  
Office of the Professions  
89 Washington Ave.  
2<sup>nd</sup> Floor Education Building  
Albany, NY 12234

Email: [regcomments@nysed.gov](mailto:regcomments@nysed.gov)

*Re: Execution by RNs of Non-patient Orders to Provide Certain Emergency Medical Services and Administer Pregnancy Tests — EDU-52-23-00006-EP*

Dear Ms. Benson:

The American Nurses Association – New York (ANA-NY), on behalf of its members and their patients, supports this proposed regulation, which would enable registered nurses (RNs) to carry out certain procedures without a patient-specific order from the attending practitioner. ANA-NY is a professional nursing organization representing the interests of New York State’s 360,000 registered nurses. ANA-NY advances the nursing profession by fostering high standards of nursing care, supporting the professional and educational advancement of nurses, and promoting the welfare of nurses to the end that all people may have better health care.

This proposed regulation will increase patient access to care, one of ANA-NY’s top priorities. Non-patient specific standing orders allow RNs to assess a patient’s medical condition and provide timely care without waiting for an attending practitioner’s direct order. Standing orders give healthcare providers more flexibility and improve patient care, while also decreasing patient wait times.

In addition, this proposed regulation will allow RNs to administer potentially life-saving tests to patients. RNs would be able to administer electrocardiograms, glucose screenings for patients with suspected hypoglycemia, and tests on patients meeting the criteria for severe sepsis and septic shock. Further, the standing order would allow RNs to establish peripheral venous access to patients who have severe sepsis and septic shock. Allowing standing orders for these practices will decrease patient wait times, improve patient outcomes, and save the lives of New Yorkers.

RNs in New York are well educated and trained. Allowing non-patient specific orders that are within an RNs scope of practice is the right policy to adopt. For these reasons, ANA-NY supports these proposed regulations and encourages their adoption as-is.

Sincerely,



Jeanine Santelli, Ph.D., RN, AGPCNP-BC, FAAN  
Executive Director, ANA-NY