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PROFESSIONAL LICENSURE COMMITTEE MAJORITY CHAIRMAN



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House of Representatives

COMMONWEALTH OF PENNSYLVANIA HARRISBURG

June 9, 2010

Mr. Kim Kaufman Executive Director Independent Regulatory Review Commission 333 Market Street, 14th Floor Harrisburg, PA 17101

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| JUN 1 1 2010 |
| INDEPENDENT REGULATORY REVIEW COMMISSION |
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RE: Proposed Regulation State Board of Nursing 16A-5122 – LPN IV Therapy

Dear Mr. Kaufman:

RECOMMENDATION: It is recommended the House Professional Licensure Committee take no formal action until final regulations are promulgated and submit the following comments:

- 1. The Committee requests that consistency and uniformity be exercised in the use of the terms registered nurse, RN, and licensed professional nurse. Although the terms may be synonymous, confusion may be created unnecessarily.
- 2. The Committee requests that the Board review 49 Pa. Code §21.203(8) for consistency with the deletion of the out of date, existing language of §21.145(f) which allowed the LPN to perform venipuncture and administer and withdraw intravenous fluids under certain specific conditions. Should practical nursing programs continue to be required to provide "Technical and clinical aspects of immunization, skin testing, the performance of venipuncture and the administration and withdrawal of intravenous fluid to the extent each function is authorized under this chapter? Does the replacement language for proposed subsection (f) address the authorization of these LPN functions? Should IV Therapy curriculum requirements be added to §21.203?

Sincerely,

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Michael P. McGeehan Chairman, House Professional Licensure Committee