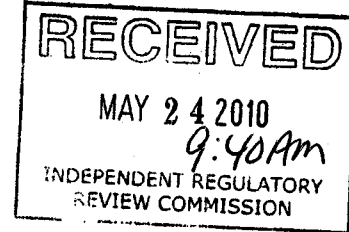




# Chester County Intermediate Unit

2840

5/12/2010



Ann Steffanic, Board Administrator  
State Board of Nursing  
P.O. Box 2649  
Harrisburg, PA 17105-2649

Re: Proposed Rulemaking  
State Board of Nursing  
IV Therapy Functions for Licensed Practical Nurses

Dear Ms Steffanic,

I have review the proposed changes to the PA code regarding the LPN and IV Therapy and have several comments.

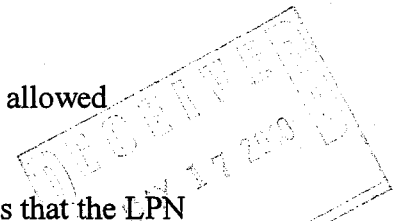
First: The proposed responsibility with TPN (Total Parenteral Nutrition) is not clear.

On page 7 it states that the LPN is not authorized to administer Total Parenteral Nutrition and then on page 12 it says that the LPN who has met the education and training requirements may perform the following IV therapy functions, one of which is administration, maintenance and discontinuance of parenteral nutrition and fat emulsion solutions. These are contradictory.

I believe that page 12 should read maintenance and discontinuance of parenteral nutrition and fat emulsion solutions.

Second: On page 12, there is a misspelling. Refer to # 10 under allowed functions for the LPN. Potency should be changed to patency.

Lastly: Regarding the functions of the LPN. The document states that the LPN participates in the planning, implementation and evaluation of nursing care using focused assessment in settings where nursing takes place. If we are going to use focused assessment as our working terminology, that term should be reflected throughout the document for consistency and it is not ( see page 8, ii, iii and iv).



Thank you for considering these comments.

Sincerely,

*Nancy L. Gattuso*

Nancy L. Gattuso, RN, MSN

*Karen McDermott*

Karen McDermott, RN, MSN

*Patricia Knecht*

Patricia Knecht, RN, MSN

*Kristine Krueger*

Kristine Krueger, RN, MSN

L'Tanya Taylor, RN, BSN

*L'Tanya M. Taylor*

