



licensed practical nurse  
association of nebraska

advocate. educate. support.

July 25, 2016

Technical Committee Members  
407 Credentialing Review Program for Dialysis Patient Care Technicians  
c/o Ron Briel, Program Manager  
Credentialing Review Program  
Licensure Unit, Division of Public Health  
Nebraska Department of Health & Human Services  
301 Centennial Mall South, P.O. Box 95026  
Lincoln, NE 68509-5026

Dear Technical Committee Members:

Please accept this letter on behalf of the Licensed Practical Nurse Association of Nebraska (LPNAN). LPNAN is the professional organization that supports, promotes, and represents all aspects of practical nursing in Nebraska. LPNAN's work is accomplished through the promotion of quality health care standards, and promotion of the diverse functions of LPNs to consumers and other health care professionals. The Nebraska Health Care Association (NHCA) is the management company for LPNAN.

LPNAN applauds the work performed by individuals working in dialysis centers. Nebraskans experience better health care because of the caring staff at each dialysis center. However, LPNAN objects to the credentialing of dialysis patient care technicians (DPCT).

Licensed Practical Nurses work at the direction of RNs or licensed practitioners. LPNs contribute to the assessment of the health status of individuals by collecting basic objective and subjective data, recording and reporting data, and assisting with validating, refining, and modifying the data. LPNs contribute to the establishment of nursing diagnoses by identifying signs and symptoms of deviation from normal health status and identifying overt learning needs. LPNs participate in the development of a plan of care for individuals and participate in the assisting and giving of care. Finally, LPNs contribute to the evaluation of the responses of individuals to nursing interventions by evaluation of data and contributing to the modification of the plan of care based on the evaluation. LPNs obtain their education in the post-secondary program that generally lasts one year.

Nebraska has a classification called LPN-C. An LPN-C has an expanded scope of practice which requires an LPN license and certification as an LPN-C. LPN-Cs are allowed to perform initial venipuncture on an upper extremity with a device three inches or less, infuse intravenous fluids, administer medications through a continuous flow central line, and administer an initial dose of approved medication all under direct supervision. Under direction, the LPN-C may also administer medications through an intermittent or continuous flow peripheral or mid-line catheter; calculate the rate of flow and regulate said rate of flow; re-insert, convert, and flush peripheral intermittent devices; and administer pain medications via Patient Controlled Analgesia. Basically, the LPN-C has additional education and certification to provide limited services in intravenous therapy.

The amended proposal for credentialing review of dialysis patient care technicians asks that the DPCTs be licensed (credentialed) and that a scope of practice mirror the duties previously outlined in the Board of Nursing advisory opinion for technicians in the outpatient dialysis setting. Every one of the items identified in the Board of Nursing opinion could be performed by an LPN or LPN-C, depending on the activity. The State has made the policy determination that the administration of IV medication requires additional training, so allowing DPCTs who do not have the base level of education seems contrary to public policy.

Because there are already groups of individuals with whom the activities requested by the application have within their scope of practice the ability to complete the actions requested by the applicant, LPNAN objects to the creation of a new license/credential for DPCTs.

Thank you for the opportunity to submit comments. If you have questions or comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Heath G. Boddy". The signature is written in a cursive, flowing style.

Heath G. Boddy  
President and CEO