



STATE OF NEW YORK  
DEPARTMENT OF HEALTH

433 River Street, Suite 303

Troy, New York 12180-2299

Antonia C. Novello, M.D., M.P.H., Dr.P.H.  
*Commissioner*

Dennis P. Whalen  
*Executive Deputy Commissioner*

July 11, 2006

Dear Administrator:

Historically, the New York State Education Department has determined that it is NOT within the scope of practice of a LPN to independently access central venous lines in any health care setting. Effective October 1, 2006, upon completion of a training program consistent with the requirements outlined in the attachment to this letter, including successful completion of a competency evaluation, it will be permissible for Licensed Practical Nurses (LPNs), working exclusively in chronic hemodialysis outpatient settings, to access and provide care to patients with central venous catheters under the direction of a Registered Professional Nurse (RN). In accordance with New York State Education Law, all LPN activities must occur under the direct supervision of a registered professional nurse (RN). With or without implementation of this new program for the expanded role of LPNs in the hemodialysis outpatient chronic dialysis setting, the RN maintains overall responsibility for the patients in the unit.

The Code of Federal Regulations (CFR) 405.2136 (d) (1) requires chronic hemodialysis outpatient facilities to have policies and procedures that ensure "All members of the facility's staff are qualified to perform the duties and responsibilities assigned to them and meet such Federal, State, and local professional requirements as may apply." Facilities that choose to participate in the program allowing LPNs to access central venous catheters must include the training and competency requirements in the facility's policies and procedures as defined in the attached document for this expanded LPN role.

Facilities will be responsible for identifying the LPN candidates determined to be eligible for this training. It is noted, however, that there may be situations where the RN is not comfortable with a trained LPN accessing central venous catheters. Facility training of LPNs is to be accomplished with the understanding that the final determination for an LPN providing this service will be at the discretion of the supervising RN. The delegation of these activities is based on the RN's professional judgment, the competence of the LPN, policy and procedures of the facility and standards of nursing practice. Regardless of the degree of delegation, however, the RN retains the ultimate responsibility for the administration and clinical management of dialysis care, including assessment of the patient for symptoms and reactions. The scopes of practice of RNs and LPNs are not interchangeable. Inappropriate use of LPNs may expose the delegating RN to a potential charge of unprofessional conduct for inappropriate delegation of professional

responsibilities and the LPN to a charge of acting outside the scope of nursing as a Licensed Practical Nurse.

The New York State Department of Health and the New York State Education Department, working cooperatively with representatives from the New York ESRD Network, providers of chronic hemodialysis outpatient services, and professional clinical staff associations, have developed the attached training program requirements. This program will allow LPNs, who have completed the formal education programs as described within the attached document to care for patients with central venous catheters ONLY in the chronic hemodialysis outpatient setting. The LPN must be under the direct supervision of the RN. This program does not apply to any other health care setting.

CFR 405.2136 (d) (6) requires that facility personnel in the chronic hemodialysis outpatient center participate in educational programs on a regular basis, including initial orientation and continuing inservice training. If the facility plans to allow LPNs to access central venous catheters as part of the provision of services, the LPN must first complete a training program, consistent with the program requirements specified in the attached document, with successful completion of a written examination and competency demonstration. The training for LPN central venous catheter access may be part, or may be independent, of the facility's initial training program. If part of the facility initial training, the written examination for the central venous catheter training for LPNs may be incorporated into the initial training comprehensive examination. It is required that LPNs receive annual updates for central venous catheter training, with successful completion of a skill based practical competency evaluation.

These LPN functions are allowed in the chronic hemodialysis outpatient setting, with successful completion of the advanced training and under the direct supervision of an RN. Registered professional nurses at the facility are to be familiar with the LPN training program to ensure they clearly understand the tasks that may be delegated to the LPN(s) under their supervision. The LPN competency evaluation requirement in this training program is not to be used as the RN competency exam for central venous catheters, since it is not inclusive of professional registered nursing processes related to this function. A separate and distinct RN demonstrated competency for central venous catheters is required. The RN is responsible for evaluating each central venous catheter patient within thirty (30) minutes (not to exceed 45 minutes) of initiation of the dialysis procedure.

The facility's responsibilities for authorizing LPNs to initiate dialysis procedures on patients with central venous catheters include:

- Develop and regularly update policies and procedures for LPN access of central venous catheters;
- Ensure LPNs have received the appropriate training for accessing central venous catheters, receive supervised clinical experience, demonstrate competency, and provide the service under appropriate supervision;
- Ensure LPNs complete an annual update training for accessing central venous line catheters, with demonstrated competency;

- Maintain onsite documentation reflecting the mandated LPN training for care of the central venous catheter dialysis patients.
- LPNs with experience in accessing central venous catheters based on employment at another facility MUST take and successfully complete the training program and competency evaluation at the current facility, in order to continue accessing central venous catheters in the provision of care to chronic hemodialysis outpatient patients.

Facility compliance with the training and competency program requirements and implementation of the LPN expanded role in the chronic hemodialysis outpatient setting will be monitored through routine New York State Department of Health surveillance activities.

The implementation of this training program is mandatory for LPNs accessing central venous catheters for the provision of dialysis services in the chronic hemodialysis outpatient setting. If you have any questions, please contact Ms. Rosemarie Miller at (716) 847-4357 or at rxm04@health.state.ny.us.

Sincerely,

Martin J. Conroy  
Director  
Division of Primary and Acute Care Services

**NEW YORK STATE DEPARTMENT OF HEALTH**  
**DIVISION OF ACUTE AND PRIMARY CARE SERVICES**

TASK FORCE ON PROVISION OF SERVICES FOR  
CHRONIC OUTPATIENT END STAGE RENAL DISEASE (ESRD) FACILITIES

Introduction

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Facilities will be responsible for identifying the LPN candidates determined to be eligible for this training. It is noted, however, that there may be situations where the RN is not comfortable with a trained LPN accessing central venous catheters. Facility training of LPNs is to be accomplished with the understanding that the final determination for an LPN providing this service will be at the discretion of the supervising RN. The delegation of these activities is based on the RN's professional judgment, the competence of the LPN, policy and procedures of the facility and standards of nursing practice. Regardless of the degree of delegation, however, the RN retains the ultimate responsibility for the administration and clinical management of dialysis care, including assessment of the patient for symptoms and reactions. The scopes of practice of RNs and LPNs are not interchangeable. Inappropriate use of LPNs may expose the delegating RN to a potential charge of unprofessional conduct for inappropriate delegation of professional responsibilities and the LPN to a charge of acting outside the scope of nursing as a Licensed Practical Nurse.

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The facility's responsibilities for authorizing LPNs to initiate dialysis procedures on patients with central venous catheters include:

- Develop and regularly update policies and procedures for LPN access of central venous catheters;
- Ensure LPNs have received the appropriate training for accessing central venous catheters, receive supervised clinical experience, demonstrate competency, and provide the service under appropriate supervision;

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- Maintain onsite documentation reflecting the mandated LPN training for care of the central venous catheter dialysis patients.
- LPNs with experience in accessing central venous catheters based on employment at another facility MUST take and successfully complete the training program and competency evaluation at the current facility, in order to continue accessing central venous catheters in the provision of care to chronic hemodialysis outpatient patients.

Facility compliance with the training and competency program requirements and implementation of the LPN expanded role in the chronic hemodialysis outpatient setting will be monitored through routine New York State Department of Health surveillance activities.

### Task Force Members

Barbara Zittel, RN, Ph.D.	New York State Education
Lydia Belardo, RN, MS	New York State Nurses Association
Deborah Elliott, RN, MBA	New York State Nurses Association
Carol Logan, RN, MS, BSN, CNN	ESRD Network of New York
Joan Arslanian, RN, MSN, CNN, FNP	ESRD Network of New York
Patricia Hansen, RN, BSN, MS	ESRD Network of New York
Donna McCarthy, RN, MHA	Fresenius Medical Care NA
Marybeth Sommer, RN, CNN	DaVita Noreasters Division
Jemma Marie Hanson, RN, BSN	Public Employees Federation
Patricia Greenberg, RN, MA	Nurse Alliance of 1199 SEIU

#### New York State Department of Health Staff

Lisa McMurdo, RN, MPH  
 Rosemarie Miller, RN  
 Vickie Ventresca, MPA

**LPN Responsibilities for Central Venous Catheter Upon Completion of the Training Curriculum**

**In a Chronic Outpatient Hemodialysis Unit**

<b>An LPN MAY:</b>	<b>An LPN MAY NOT:</b>
-Administer bolus of medications by IV push in a chronic out patient hemodialysis treatment center consistent with the procedures defined in Section 400.15 of 10NYCRR.	- Function independently of RN direction
-Gather measurements, signs and symptoms that can be used by the RN in making decisions about the nursing care of specific patients	-Interpret patient clinical data or act independently on such data. -Triage -Establish nursing care plans
-Provide nursing treatments	-Assess -Create, initiate, or alter nursing goals
-Identify and set up supplies necessary for accessing a CVC.	
-Initiate treatment with a CVC	-Access a newly placed catheter -Assess catheter mechanical obstructions
-Draw blood from a CVC	
-Clean and redress a CVC	- Replace catheter extensions
-Monitor and adjust flow rates of central venous catheter access device/line.	-Correct flow difficulties related to catheter tip position, thrombolytic event, and/or mechanical occlusion
-Intervene if there is a catheter/blood line disconnection	May not reconnect lines independent of RN direction
-Discontinue dialysis treatment with a CVC.	-Evaluate the need for use of thrombolytic agents.

## **Facility Responsibilities**

The facility has the responsibility to make sure that the:

- LPN has satisfactorily completed an initial training program with supervised clinical experiences and documented competence.
- LPN is appropriately supervised by an RN.
- LPN completes an annual dialysis care competency and evaluation update.
- Policies and procedures related to central venous catheters (CVC) include but are not limited to:
  - Initiation of the dialysis treatment using a CVC
  - Termination of the dialysis treatment using a CVC
  - Exit site care
  - Complications associated with CVC
- Maintain on site documentation of LPN training to include comprehensive exam and completion of competency checklist.

## **Objectives of the Training Program**

At the completion of this program, the licensed practical nurse in the **chronic outpatient hemodialysis unit** will be able to:

- Define and state the purpose of a central venous catheter.
- Describe the uses and major types of central venous catheters used for hemodialysis.
- Identify the sites most frequently used for catheter placement.
- Discuss basic understanding of vascular anatomy as it pertains to central venous catheters.
- Discuss the signs and symptoms and complications related to central venous catheters.
- Describe the individual responsibilities of the Licensed Practical Nurse in relation to central venous catheters.
- Demonstrate competency in the skills check list as presented in the attachment.

## **Training program must include as a minimum:**

- Review of facilities policies and procedures related to central venous catheters to include but not limited to:
  - Pre observation and initiation of the dialysis treatment using a CVC
    - ***The RN will assess the patient with a CVC within 30 minutes of initiation to dialysis. (not to exceed 45 minutes)***
    - ***If the LPN identifies any unusual observations, the RN will be notified and treatment will NOT be initiated until an assessment by the RN is performed.***
  - Termination of the dialysis treatment using a CVC

- Exit site care
- Complications associated with CVC
- Documented knowledge of:
  - Anatomy and physiology related to the CVC
    - Common catheter insertion sites
    - Types of CVC
  - Signs and symptoms of complications and adverse reactions related to CVC
    - Infections
    - Clotting
    - Patency related to blood flow
- Document demonstrated competency
  - Infection control practices related to CVC
  - Function, use and maintenance of CVC
    - Observation
    - Initiation of the dialysis treatment using the CVC
    - Monitoring the patient with the CVC
    - Termination of the dialysis treatment using the CVC

**Responsibilities of the Licensed Practical Nurse under the Supervision of the Registered Professional Nurse ONLY in the Outpatient Hemodialysis Setting, will include:**

- Reporting of any unusual observations to the Registered Nurse
- Withholding initiation of treatment until assessment is completed by the RN if unusual observations are noted pre dialysis
- Successfully completing a facility specific hemodialysis training program which includes:
  - CVC training program
  - A comprehensive competency checklist with return demonstration of skills
  - A facility specific comprehensive final exam

**Responsibilities of the Registered Nurse**

- Assessment of the patient will be completed within 30 minutes of initiation of dialysis (not to exceed 45 minutes) and must be documented.
- Assessment and treatment of all complications.
- Presence in the unit at all times.



<b>Central Venous Catheter - Initiation of Treatment</b>	<b>Date Taught</b>	<b>Return Demonstration Date(s)</b>	<b>Needs Practice</b>	<b>Satisfactory Performance Date</b>	<b>Eval. Initials</b>	<b>Staff Initials</b>
<b>Gathers and organizes supplies appropriate for accessing the CVC</b>						
<b>Demonstrates appropriate use of personal protective equipment (PPE)</b>						
<b>Prepares heparin and saline flushes aseptically</b>						
<b>Ensures that all persons in attendance, including the patient, are wearing a mask and the patient's head is turned to the opposite side before removing caps and accessing the catheter.</b>						
<b>Ensure that a clean field is under the CVC</b>						
<b>Washes hands and puts on clean gloves before working with the catheter.</b>						
<b>Correctly distinguishes between the arterial and venous catheter limbs</b>						
<b>Soaks port/cap connections following manufacturer's recommendation.</b>						
<b>Ensures the clamps of the catheter limbs are closed during cap removal/syringe placement</b>						
<b>Aspirates anti-coagulant / thrombolytic agent and aseptically flushes catheter lumens with saline</b>						
<b>Obtains pre-treatment lab samples per procedure</b>						
<b>Connects arterial and venous bloodlines aseptically to the correct catheter limbs</b>						
<b>Ensures connections are made correctly and are secure</b>						
<b>Secures bloodlines to minimize tension on bloodline/catheter connection or kinking of bloodlines</b>						
<b>Turns blood pump on per unit policy and observes for signs of inadequate blood flow rate (BFR): pre pump arterial pressure &lt;-250, bloodline collapse, or jumping</b>						
<b>Checks venous pressure to ensure it is within acceptable range per unit policy</b>						
<b>Turns blood pump to prescribed flow rate</b>						

<b>Central Venous Catheter - Initiation of Treatment Continued</b>	<b>Date Taught</b>	<b>Return Demonstration Date(s)</b>	<b>Needs Practice</b>	<b>Satisfactory Performance Date</b>	<b>Eval. Initials</b>	<b>Staff Initials</b>
<b>Immediately reports any difficulties in achieving ordered blood flow to RN</b>						
<b>Checks venous and pre pump arterial pressure to ensure reading is in acceptable range per unit policy</b>						
<b>Central Venous Catheter - Dressing Change</b>						
<b>Gathers and organizes supplies appropriate for cleaning and redressing the patient's specific brand of catheter</b>						
<b>Demonstrates appropriate use of PPE</b>						
<b>Ensures that all persons in attendance, including the patient, are wearing a mask and the patient's head is turned to the opposite side before removing the old catheter dressing.</b>						
<b>Inspects for catheter position, intact sutures and signs of infection at the insertion site</b>						
<b>Reports unusual finding to the RN</b>						
<b>Washes hands and puts on clean gloves prior to beginning exit site care</b>						
<b>Cleans insertion site with appropriate cleaning solution</b>						
<b>Cleans insertion site area, moving in concentric circles away from the insertion site</b>						
<b>If povidone iodine solution is used, allows the solution to dry for 2-3 minutes before proceeding</b>						
<b>Places appropriate dressing per unit policy</b>						
<b>Documents dressing change and observations on the treatment sheet</b>						

Central Venous Catheter - Monitoring During Treatment	Date Taught	Return Demonstration Date(s)	Needs Practice	Satisfactory Performance Date	Eval. Initials	Staff Initials
Ensures the patient's access is visible at all times						
Checks that bloodline/catheter limb connections remain secure during routine safety checks						
Ensures bloodlines remain secure and that there is no tension on the line or kinking of bloodlines.						
PRE-PUMP ARTERIAL PRESSURE Monitoring						
Employs appropriate observations and interventions to improve blood flow if pre pump pressure > -250						
Documents arterial pressure readings appropriately						
If necessary, reduces blood flow and documents appropriately						
Reviews medical record for adverse trends in arterial pressure						
Notifies RN of any problems achieving BFR						
VENOUS PRESSURE MONITORING						
Evaluates venous pressure values for elevated venous pressure readings						
Employs appropriate interventions to reduce elevated venous pressures						
If necessary, reduces blood flow and documents appropriately						
Reviews medical record for adverse trends in venous pressure						
Ensures RN is aware of problems with elevated venous pressure and that any adverse trends have been noted						
Central Venous Catheter - Termination of Treatment						
Prepares saline flushes aseptically						

Central Venous Catheter - Termination of Treatment Continued	Date Taught	Return Demonstration Date(s)	Needs Practice	Satisfactory Performance Date	Eval. Initials	Staff Initials
Checks documented fill volumes of each catheter lumen and prepares prescribed strength of anticoagulant / thrombolytic aseptically						
Washes hands and puts on clean gloves prior to performing procedure. Demonstrates appropriate use of PPE						
Ensures that the field is clean under the catheter						
Soaks port/bloodline connection per manufacturer's recommendation						
Clamps catheter limbs following reinfusion						
Ensures that all persons in attendance, including the patient, are wearing a mask and the patient's head is turned to the opposite side prior to disconnection.						
Ensures catheter limbs are clamped before disconnection						
Disconnects bloodline and aseptically applies saline-filled syringe immediately to each catheter limb						
Flushes catheter lumens with saline and clamps each limb						
Checks that anticoagulant / thrombolytic dose is the correct amount for each catheter lumen						
Removes empty saline syringes one at a time and immediately replaces them with anticoagulant / thrombolytic filled syringe						
Instills dwell quickly and clamps immediately to prevent backflow of blood into the catheter lumen. Clamps each catheter limb						
Removes empty syringes anticoagulant / thrombolytic one at a time and immediately and aseptically applies sterile end caps						
Ensures catheter limbs are clamped						

CATHETER / BLOODLINE SEPARATION	Date Taught	Return Demonstration Date(s)	Needs Practice	Satisfactory Performance Date	Eval. Initials	Staff Initials
Assures access remains visible at all times and connections are checked with each patient/machine check during the dialysis treatment						
Demonstrates knowledge of nursing interventions for catheter/blood line disconnect						
CATHETER CARE						
Demonstrates knowledge of signs and symptoms associated with catheter related infection						
Notify RN of any signs and symptoms of infection						
Instructs patients, families, nursing homes, etc. on patient hygiene, signs and symptoms of catheter related infections, reinforcement of catheter dressing, and pros and cons of showering						

Comments: \_\_\_\_\_

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Instructor Signature (s) and Date (s):

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Trainee Signature and Date:

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