KIM REYNOLDS, GOVERNOR CHRIS COURNOYER, LT. GOVERNOR LARRY JOHNSON, JR., DIRECTOR

June 2, 2025

## Via Electronic Mail

To:
Kellie VanRee
LeadingAge Illinois/Iowa
kvanree@leadingageiowa.org

Brenda Irlbeck
Iowa Healthcare Association
Brenda@iowahealthcare.org

Debbie Fisher Iowa Assisted Living Association dfisher@newburyliving.com

Re: Licensed Practical Nurse (LPN) Scope of Practice

Dear Kellie, Brenda, and Debbie,

We acknowledge receipt of the proposals submitted by LeadingAge Iowa/Illinois and the Iowa Healthcare Association, requesting a formal rule change and/or a statewide waiver to permit Licensed Practical Nurses (LPNs) to perform initial evaluations and assessments, as well as assessments prompted by significant changes in a tenant's condition. We appreciate the opportunity to collaborate on solutions that address the workforce needs of Assisted Living Programs (ALPs) while ensuring the health and safety of tenants remain a top priority.

To summarize, the Iowa Board of Nursing has recently adopted a rule change to IAC 655—Chapter 6, amending the LPN scope of practice to include participation in initial and ongoing assessments of a patient's health status. This rule change will take effect on June 4, 2025. Currently, under IAC 481—Chapter 69, LPNs are not authorized to conduct such assessments or evaluations.

On behalf of ALPs, LeadingAge Iowa/Illinois has requested that a rule change be considered ahead of the formal red tape review process required under Executive Order 10. Additionally, the Iowa Healthcare Association has submitted a request for a statewide waiver of IAC 481—Chapter 69, allowing LPNs to perform these tasks until a permanent amendment is adopted.

To address workforce challenges and provide a clear path forward, the Department proposes the following:

- Effective June 4, 2025, LPNs will be authorized to conduct initial assessments/evaluations and
  evaluations or nurse reviews necessitated by significant changes in a tenant's condition in ALPs,
  provided they do so under the supervision of a Registered Nurse (RN).
- The Adult/Special Services Unit is currently conducting the red tape review for IAC 481—Chapters 67 and 69, which is expected to conclude later this year.
- During this process, the Department will update IAC 481—69.22 and 69.27 to align with the standards set forth in IAC 655—Chapter 6, resulting in permanent rule changes.

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Thank you for your continued partnership to ensure quality care to the tenants of lowa's assisted living programs.

Sincerely,

Catie Campbell, Unit Manager Adult & Special Services

Catil Campbell

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