



November 11, 2024

Emily DeRonde  
6200 Park Ave  
Des Moines, Iowa 50321  
Emily.deronde@dia.iowa.gov

Re: Comments on Administrative Rule Changes and Regulatory Analysis

Dear Emily,

LeadingAge Iowa is a trade association representing non-profit long-term care supports and services throughout the state of Iowa. We pride ourselves on advocating for our members who provide excellent quality of care throughout the long-term care continuum of services. Within our membership there are several levels of long-term care services and support who employ licensed nurses.

We fully support the administrative rule changes, especially the removal of the initial assessment from only the registered nurse scope of practice and the ability to carry over up to 50% of unused continuing education hours.

In the revisions included in 655-6.3(b) which states “Participating in both the initial and ongoing nursing assessment of the patient’s health status. The registered nurse is responsible for the plan of care, including verifying and interpreting the initial assessment data obtained by the licensed practical nurse.” The removal of the language in 655-6.2(5)a that limits the initial assessment and ongoing application of the nursing process aligns with the revisions included in the licensed practical nurse scope of practice. However, the language regarding the registered nurse’s responsibility to verify and interpret the initial assessment when obtained by the licensed practical nurse is excluded. If a registered nurse is expected to complete this critical step to ensure patient safety, it is necessary to include it in the registered nurse’s scope of practice as well.

Furthermore, an example included in the rule or in an additional document (such as a frequently asked questions resource) that outlines what the expectation of “verifying and interpreting” includes would be helpful. This will provide guidance to a delegating registered nurse as to the expectations when an initial or significant change of condition assessment is completed by a licensed practical nurse.

Lastly, the proposed rule changes included in the regulatory review of 655-5 outline the process for continuing education. LeadingAge Iowa supports the removal of language potentially limiting continuing education requirements. The rules included in the continuing education requirements do not outline if out of state continuing education provided by an approved continuing education provider would be allowable to fulfill the continuing education requirements. For example, as a registered nurse, if I attend a LeadingAge Illinois event, am I able to use the hours towards the 36-hour requirement for renewal since LeadingAge Illinois is an approved continuing education provider with the Illinois Board of Nursing? A clarification of the effective date may also be beneficial. For example, will the Board of Nursing accept any continuing education hours from the last renewal period for a nurse that is renewing soon, or would the carry over begin from their current renewal period?

Please let me know if you have any questions.

Sincerely,

A handwritten signature in dark blue ink that reads "Kellie Van Ree". The signature is written in a cursive, flowing style.

Kellie Van Ree  
Director of Clinical Services  
LeadingAge Iowa  
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Urbandale, IA 50322  
[kvanree@leadingageiowa.org](mailto:kvanree@leadingageiowa.org)