



TO Private Licensed/Registered Schools
FROM Nicole Campbell, Division Chief
DATE February 15, 2024
RE Private Licensed Schools Policy Memorandum #113

Phlebotomy Programs

The State Board of Private Licensed Schools, at the meeting held on February 15, 2024, approved the following policy under the authority of 24 P.S. §6504 (a).

New Program Application

In addition to all other State Board of Private Licensed School new program application requirements, the following requirements must be included when applying to offer Phlebotomy training programs.

Board-Approved, Existing Program

In addition to all other State Board of Private Licensed School licensure renewal requirements, the following requirements must be demonstrated in previously approved Phlebotomy training programs. If the addition of these requirements changes the school's program length, objectives, or outcomes, the school will need to seek program change approvals as necessary. Previously approved Phlebotomy training programs must meet the following requirements upon licensure renewal to be able to continue to offer the program.

Phlebotomy Program Requirements

The State Board of Private Licensed Schools has determined that a required number of clock hours, or a required number of unaided collections, is not necessary, providing that the proposed program offers adequate opportunity for the student to learn and practice the necessary skills.

Phlebotomy programs, at minimum, must meet the instructional requirements specified by the U.S. Department of Education, National Center for Education Statistics, [CIP Code](#) and by the U.S. Bureau of Labor Statistics [Occupational Outlook Handbook](#).

- Basic vascular anatomy and physiology
- Blood physiology
- Medical terminology
- Utilize necessary scientific principles and select appropriate phlebotomy actions, awareness of contraindications to blood draws
- Identify crisis situation and apply appropriate skills
- Collection handling, identification, labeling, and tracking

- Collection sanitation procedures and applicable health and safety standards and regulations
- Infection prevention and control
- Avoidance of contaminated phlebotomy equipment; cleaning and disinfecting materials used on more than one patient; waste management and disposal of used equipment
- Occupational exposure and post-exposure prophylaxis
- Skin puncture techniques and specimen collection to include capillary blood
- Venipuncture techniques and specimen collection to include venous blood
- Proficiency in the blood collection procedures on the patient population that will be within their scope of practice (i.e., adults, pediatric, neonatal, intensive care, blood transfusion)
- Provide the opportunity for students to become CPR BLS certified
- Communication skills
- Standards of practice and quality care for patients and health workers; informed consent and patient rights
- Quality control
- Immunizations and tests

Additional areas to consider when designing program curriculum:

- Do enrollment/admission requirements align with certification and job opportunity requirements?
For instance:
 - Does the individual need to be a high school graduate or equivalent?
 - Does the individual need to have evidence of their immunization history?
 - Is the individual aware of the physical stamina requirements of the position? How will you make this known to the individual?
- Does the curriculum align with certification and job opportunity requirements?
For instance:
 - Are the number of lecture, lab, and clinical experience hours sufficient?
 - Are the number and type of sticks completed on human or artificial arms sufficient?
 - Are the training area accommodations and design OSHA compliant? i.e., carpeting, fabric chairs, access to a sink, signage etc.
 - Have you provided clear disclosures regarding the school's accreditation status in conjunction with certification eligibility requirements?
- If the program is less than 100 hours, in addition to presenting the required job opportunities, the school will be required to provide, from local employers, letters of support and the employer's intent to hire graduates of an accelerated program of this length.

The State Board of Private Licensed Schools does not promote, endorse, guarantee, or promise your school and/or program can be or will be approved by additional agencies.

The school is solely responsible for investigating and disclosing any additional necessary statements or disclosures.

State Board of Private Licensed Schools program approval does not supersede any approvals required by additional agencies or entities that also oversee/authorize/approve/accredit the school and/or program. If the school and/or program is overseen/authorized/approved/accredited by additional agencies or entities, it is the school's responsibility to obtain all necessary approvals.

Should you have any questions, please contact your school's assigned Board Administrator.