

**Clinical Laboratory Technology Advisory Committee (CLTAC)  
Position Paper on Education, Training and Certification for Phlebotomists**

**August 1997**

The Clinical Laboratory Technology Advisory Committee (CLTAC) recommends that Title 17 California Code of Regulation (CCR) Section 1034 be amended to increase education and training requirements for unlicensed persons performing phlebotomy.

The CLTAC recommends that a new category of laboratory personnel be established under authority of Business and Professions Code (BPC) Section 1208 (a). This new category should be called a "Certified Phlebotomy Technician".

The CLTAC recommends that the Certified Phlebotomy Technicians be certified as meeting education, training and experience requirements established in the amended 17 CCR Section 1034.

The CLTAC subcommittee on Phlebotomy recommends that education and training standards for Certified Phlebotomy Technicians (CPT) and Blood Donor Phlebotomists (BDP) be prepared separately with the BDP regulations submitted as emergency regulations.

The CLTAC subcommittee on Phlebotomy recommends the standards in the following position paper presented to the CLTAC by the Phlebotomy subcommittee for consideration be added to regulations in 17 CCR Section 1034.

1. ***Definitions***

- |                                   |   |
|-----------------------------------|---|
| <b>"Arterial puncture"</b>        | Penetration by needle of an artery of a human for the purpose of collecting blood for testing purposes.   |
| <b>"Blood Donor Phlebotomist"</b> | A person certified to withdraw blood from the human body by: <ol style="list-style-type: none"><li>a) venipuncture to collect blood or blood components for the purposes of subsequent transfusion, future manufacture and/or samples for tests related to blood or tissue donation or research.</li><li>b) capillary puncture to qualify a donor, including the performance of waived tests related to blood donation.</li></ol> |

<b>“Capillary puncture”</b>	Penetration of the skin of a human for the purpose of collecting blood for testing purposes.
<b>“Certified Phlebotomy Technician” (CPT)</b>	A person who has registered with the California Department of Health Services, has met all the education, training and experience requirements in state regulations, and has passed written and practical examination in phlebotomy by an approved national accreditation organization in phlebotomy.
<b>“Finger stick”</b>	Penetration of the skin of a human finger for the purpose of collecting capillary blood for testing purposes.
<b>“Phlebotomist”</b>	A person who collects blood samples from the human body for testing purposes by venipuncture, capillary puncture or arterial puncture.
<b>“Phlebotomy”</b>	The act of penetrating a vein, artery or skin of a human with a needle or device for the purpose of collecting blood for testing purposes.
<b>“Successful venipunctures”</b>	Collecting the correct sample in the correct tube on the first attempt without severe trauma to the patient.
<b>“Venipuncture”</b>	Penetration by needle of a vein of a human for the purpose of collecting blood for testing purposes.

## **II Certification**

- A. Laboratory Field Services (LFS) should approve national phlebotomy accrediting Organizations for certification of phlebotomists. These organizations must agree to allow to their examinations, only candidates who have met all the education, training/or experience requirements in California regulations.

- B. LFS should approve phlebotomy training programs that are in compliance with standards in regulations.
- C. LFS should issue certificates to candidates who are accredited by a national phlebotomy accrediting organization. These two year certificates will attest that these persons are good-standing “Certified Phlebotomy Technicians”. A small fee will cover the costs of this program. The reason for issuing the certificates is to permit possible enforcement action for malpractice.
- D. Certificate from training facility signed by program director attesting to the completion of training, including special endorsements.

**III Routes to certification**

- A. A person who is currently performing phlebotomy may continue to do so for four years after final filing of these regulations. After that time, he/she must pass a national certification examination to continue providing phlebotomy services, as listed in C, below.
- B. A phlebotomist candidate who has completed training stated in regulation, but who has not taken and passed a certification examination, may practice phlebotomy only in a licensed clinical laboratory until he/she passes the examination. If the examinee fails the examination, he/she may retake the examination within a 12 month period. If unsuccessful after this period of time, the examinee would need to stop performing phlebotomy and take additional education courses and training leading to re-examination, or
- C. The education and training leading to candidacy for certification as a Certified Phlebotomy Technician include:
  - 40 hours minimum of didactic instruction
  - 40 hours of practical instruction
  - including
  - 40 venipunctures with a 90% success rate
  - and
  - 5 successful capillary punctures
- D. The education and training for a Blood Donor Phlebotomist to be a candidate for certification as a Certified Phlebotomy Technician, include:
  - Certification as a Blood Donor Phlebotomist
  - and
  - 20 hours Minimum of didactic instruction

20 hours of practical instruction  
including  
20 venipunctures with a 90% success rate  
and  
5 successful capillary punctures

- E. The education and training for a Certified Phlebotomy Technician to be a candidate for certification as a Blood Donor Phlebotomist include the addition of :

20 hours minimum of didactic blood donor instruction  
20 hours of practical blood donor instruction  
20 venipunctures with a 90% success rate  
and  
5 successful capillary punctures

- F. The education and training leading to candidacy for certification as a Certified Phlebotomy Technician, including approval to perform arterial punctures include:

All of the above (C), plus:  
10 hours minimum of didactic arterial instruction to be followed by 10 hours minimum of practical training to include 10 arterial punctures (5 radial and 5 brachial) with a 90% success rate.  
Competency evaluation by a Laboratory Director and/or his/her designee prior to the performance of arterial punctures.

- G. Clinical training shall be done under the direction of a licensed Physician and Surgeon, Clinical Bioanalyst, or a licensed Clinical Laboratory Scientist. The clinical instruction may be delegated by these persons(s) to a Certified Phlebotomy Technician with a minimum of three years experience or any other healthcare professional authorized by their scope of practice to perform phlebotomy with a minimum of three years experience.

- H. Didactic instruction shall include the following:

- a. Anatomy and physiology pertinent to phlebotomy
- b. Specimen handling
  1. additives/anticoagulants
  2. order of draw
  3. test requirements
  4. identification techniques

5. blood culture collections
- c. Venipuncture techniques
    1. syringe
    2. vacuum tube
    3. butterfly technique
  - d. Capillary technique
    1. heel
    2. finger
    3. earlobe
  - e. Arterial Puncture (10 additional hours of didactic instruction)
  - f. Safety and Infection Control
    1. Hazards and complications
    2. First Aid, CPR, Universal precautions and HIV precautions
  - g. Professionalism
    1. patient interaction
    2. legal issues: laws and regulations affecting phlebotomy
    3. quality assurance
    4. medical ethics
  - h. Practical Instruction
    1. Should include a 90% success rate in venipunctures on human subjects.
    2. Heel punctures because they are not performed in all institutions, will be covered during competency evaluations by the Laboratory Director and/ or his/her designee.

#### ***IV Competency Assessment***

Competency in phlebotomy will be assessed under the direction of the Laboratory Director and/or his/her designee prior to employment as a phlebotomist.

**V Criteria for Instructors**

Phlebotomy Instructors must be licensed under Chapter 3 of the Business and Professions Code and have three years phlebotomy experience. Alternatively they may be:

- A. A Certified Phlebotomy Technician (CPT) with three years experience.
- B. Any other healthcare professional authorized by their scope of practice to perform phlebotomy with three years experience.

**VI Facilities for Instruction**

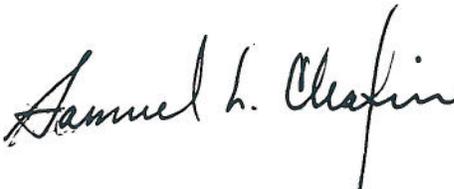
Instruction shall take place in facilities suitable for California OSHA safety guidelines to be maintained, including hazardous waste disposal, universal precautions and precautions for hepatitis and HIV.

**VII Scope of Practice**

- A. A Phlebotomist who is a Certified Phlebotomy Technician may work for a licensed clinical laboratory, or outside the environment of a licensed clinical laboratory, but may only collect blood for testing purposes upon the specific authorization of an appropriately licensed health care provider.
- B. A Certified Phlebotomy Technician may perform arterial punctures for testing purposes only when he/she has demonstrated competency by additional arterial punctures under a licensed physician and surgeon and /or his/her designee.
- C. Continuing Training

A minimum of three hours per year (or six hours every two years) of continuing training.

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