

**Department of Health**  
**Nursing Care Quality Assurance Commission**

# Advisory Opinion

The Nursing Care Quality Assurance Commission (NCQAC) issues this advisory opinion in accordance with [WAC 246-840-800](#). An advisory opinion adopted by the NCQAC is an official opinion about safe nursing practice. The opinion is not legally binding and does not have the force and effect of a duly promulgated regulation or a declaratory ruling by the NCQAC. Institutional policies may further restrict practice in that facility's setting and/or impose additional requirements to assure patient safety and/or decrease risk.

**Title:** Delegation of Blood Glucose Monitoring to Nursing Assistants or Health Care Aides in Community-Based Settings **Number:** NCAO 14.01

**References:** [RCW 18.79 Nursing Care](#)  
[WAC 246-840 Practical and Registered Nursing](#)  
[Nursing Scope of Practice Decision Tree](#)

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**Approved By:** Nursing Care Quality Assurance Commission

## Conclusion Statement

The Nursing Care Quality Assurance Commission determines it is within the scope of practice of an appropriately prepared and competent registered nurse (RN) to delegate to the nursing assistant-registered (NA-R), nursing assistant-certified (NA-C), or certified-home care aide (C-HCA) the following tasks in community-based settings:

- Pierce the skin to get a blood sample to measure blood glucose using a Clinical Laboratory Improvements Amendments (CLIA) [Clinical Laboratory Improvements Amendments \(CLIA\)](#) waived test to monitor treatment response and/or for administering medications for the treatment of diabetes.
- Give insulin injections and non-insulin injections, such as exanatide (Byetta®, liraglutide (Victoza®, dulaglutide (Trulicity®), and albiglutide (Tanzeum®), approved by the Food and Drug Administration (FDA) and prescribed with similar purpose and effect for treatment of diabetes.

## Background and Analysis

[RCW 18.79.260](#) allows registered nurses to delegate to a Washington State NA-R, NA-C, or C-HCA blood glucose monitoring and insulin injection in community based settings. The definition of community-based settings includes:

- In-home care settings,
- Adult family homes,
- Assisted living facilities, and
- Community residential programs for people with developmental disabilities certified by the Washington State Department of Social and Health Services.

[RCW 18.79.260](#) prohibits delegation of any activity that requires piercing or severing of the tissues, with the exception of insulin injection in community-based settings. The laws and rules do not define the term, “monitoring” used in the laws and rules. The commission determined that “monitoring” includes performing a Clinical Laboratory Improvement Amendments (CLIA)-waived blood glucose test involving puncturing of the skin, and that this activity is an exception to the law.

## Recommendations

The delegating nurse must follow the delegation laws and rules, the delegation process, and clinical care standards.

Prior to delegation of a CLIA-waived blood glucose test for a client who is **NOT** receiving insulin injections, the delegating nurse must:

- Evaluate the appropriateness of the delegation;
- Verify completion of the “Fundamentals of Caregiving” and the “Core Nurse Delegation Program” through the Washington State Department of Social and Health Services (DSHS). The Washington State DSHS “Diabetic Training Program” is not required, but recommended;
- Determine the competency of the individual to perform the task; and
- Supervise the NA-R, NA-C, or C-HCA carrying out the task.

Prior to delegation of a CLIA-waived blood glucose test for a client who **IS** receiving insulin injections, the delegating RN must:

- Evaluate the appropriateness of the delegation;
- Verify completion of the “Fundamentals of Caregiving”, the “Core Nurse Delegation Program”, and the “Diabetic Training Program” through the Washington State DSHS;
- Teach the individual about proper injection procedures and the use of insulin, demonstrate proper injection procedures,

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- Supervise the NA-R, NA-C, or C-HCA carrying out the task
- Supervise and evaluate the NA-R, NA-C, or C-HCA weekly during the first four weeks of delegation of insulin injections. If the delegating RN determines that the individual is competent to perform the injection properly and safely, supervision and evaluation shall occur at least every ninety days.

### Conclusion

The delegating nurse may delegate administration of insulin and non-insulin medications for treatment of diabetes; the delegating nurse may delegate CLIA-waived blood glucose testing following the delegation laws and rules, the delegation process, and clinical care standards.

### References

RCW 18.79.260 – Registered Nursing – Activities Allowed – Delegation of Tasks:  
<http://app.leg.wa.gov/rcw/default.aspx?cite=18.79.260>

WAC 246-841-405 – Nursing Assistant Delegation:  
<https://apps.leg.wa.gov/WAC/default.aspx?cite=246-841-405>

WAC 246-840-930: Criteria for Delegation: <http://apps.leg.wa.gov/WAC/default.aspx?cite=246-840-930>

WAC 246-841-405: <http://apps.leg.wa.gov/wac/default.aspx?cite=246-841&full=true#246-841-405>

CLIA-Waived Test – U.S. Food and Drug Administration:  
<https://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/IVDRegulatoryAssistance/ucm124105.htm>

Washington State DSHS Long-Term Worker Training Curriculums:  
<https://www.dshs.wa.gov/altsa/training/dshs-curriculum-available>