

2700

TO: Pennsylvania State Board of Nursing

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RE: Regulation ID#16A-5133(IRRC#2700): Clinical Nurse Specialists

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I am writing in response to State Board of Nursing Proposed Regulation #16A-5133 (IRRC#2700): "Clinical Nurse Specialists". My concerns include the section 21.811

INDEPENDENT REGULATORY
REVIEW COMMISSION

- *The educational requirement of a master's degree in nursing, doctorate degree in nursing or postmaster's degree or certificate in nursing at an accredited, Board-approved nursing education program that prepared the applicant to practice as a CNS, and , if there is no certification examination available in the specialty area, shall demonstrate equivalence to National certification.*

I want to use my situation to illustrate my concerns. I graduated from the University of Pittsburgh, School of Nursing in 1980 with a Master's in Nursing, Maternity Nursing Specialty. During the time I was enrolled in Pitt's graduate program, our program director stated to us that we were prepared as "Clinical Nurse Specialists" which was supported by extensive clinical rotations at both Magee-Women's Hospital and Children's Hospital of Pittsburgh. The other graduate nursing degrees awarded by Pitt at that time were Master's in Nursing Education/Administration and PhD. I know that the State Board of Nursing approved the University of Pittsburgh's School of Nursing graduate programs. However, I do not have a confirmation that the accreditation focused on the CNS component.

The second concern I have relates to the national certification examination requirement. My specialty is Maternity Nursing, and I have functioned successfully and effectively in the role of clinical nurse specialist for maternity and perinatal bereavement since 1984. I have been certified as an Inpatient Obstetric Nurse by NCC (Naacog Certification Corporation) since 1985. There is no advanced practice certification examination for my specialty. Demonstrating equivalence to national certification through portfolio submission is an acceptable alternative to examination. However, my national specialty organization does not offer a portfolio review as does the Wound, Ostomy, Continence Nurses Association. I recommend that the Board consider development of a generic template for portfolio development that would be one option to meet the equivalence to national certification requirement.

I have successfully and effectively functioned as a clinical nurse specialist in maternity for over 24 years. Throughout my career, I have implemented the three spheres of influence (patient/client, nursing personnel, and organization/network) as defined by The National association of Clinical Nurse Specialists (NACNS). I strongly encourage the State Board of Nursing to amend Act 49, CH. 21, regulation ID#16A-5133 (IRRC#2700) to include the provision to grandfather nurses with a Master's Degree in Nursing who have previously demonstrated success and effectiveness in the role of the clinical nurse specialist.

I can be reached at 717-991-7736 if you need more information.

Sincerely,

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