

American  
Psychiatric  
Nurses  
ASSOCIATION

#2700

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

July 10, 2008

Ann Stefanic  
Board Administrator  
State Board of Nursing  
P.O. Box 2649  
Harrisburg, PA 17105-2649

Dear Ms. Stefanic:

Thank you for the opportunity to present comments to the State Board of Nursing proposed Regulation #16A-5133 (Clinical Nurse Specialists). The PA Chapter of the American Psychiatric Nurses Association (APNA-PA) asks the Board to consider the following recommendations:

**1. In the preamble, Strike §21.811(2)(iii) beginning with "Third," and ending with "certifying examination." APNA-PA recommends that you replace the deleted lines with: Third, the nurse holds a current national certification as a Clinical Nurse Specialist from the American Nurses Credentialing Center (ANCC).**

We understand that the intent of this section is to allow the CNS who was certified by ANCC in the 1970s, when there were different eligibility requirements, and who have maintained their ANCC CNS certification to be allowed to continue to be identified as a CNS. The proposed statement is clear, concise and will eliminate confusion/debate over the MSN requirement.

**2. In §21.811(1)(i) strike "National Council of State Boards of Nursing (NCSBN)" and replace with National Organization of Competency Assurance (NOCA).**

The National Council of State Boards of Nursing has no authority as an accrediting body, thus this change is entirely appropriate. NOCA has a longstanding history of being the leader in establishing quality standards for credentialing organizations.

**3. §21.813(d)(1) does not take into consideration the CNS who will not have access to official transcripts.**

In the event that a nursing program has closed and the CNS applicant does not have access to official transcripts, APNA-PA recommends that other documentation of curriculum, such as course descriptions, be acceptable in cases where official transcripts are not available.

4. APNA-PA recommends that in §21.813(f) strike the words "12 months," and replace with: 18 months from the date of first application for recognition as a CNS.

This will allow the CNS applicant adequate time meet compliance standards of these regulations prior to losing their ability to practice.

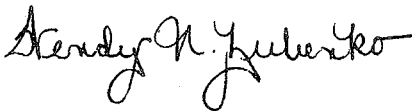
5. APNA-PA recommends that the Scope of Practice for the CNS, as stated in Act 49 of 2007, Section 8.6 need not to be included in these regulations as this is clearly and definitively stated in the Act."

Regulation #16A-5133 is title recognition legislation not a Scope of Practice legislation.

APNA-PA appreciates and is honored to have the opportunity to provide comments to the State Board of Nursing on its proposed rulemaking regarding title protection for Clinical Nurse Specialists.

If you have any questions in regard to APNA-PA's comments, please feel free to contact me at (412) 246-6530 or by e-mail at [wzubenko@pitt.edu](mailto:wzubenko@pitt.edu).

Respectfully,



Wendy N. Zubenko, EdD, MSN, PMHNCS-BC  
President-Elect, APNA-PA  
Chair, APRN & Legislative Committee, APNA-PA

Cc:  
Honorable Robert M. Tomlinson, Chair  
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House Professional Licensure Committee

Arthur Coccodrilli, Chairman  
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