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NATIONAL ASSOCIATION OF  
CLINICAL NURSE SPECIALISTS

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July 11, 2008

INDEPENDENT REGULATORY  
REVIEW COMMISSION

#2700

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

Dear Ms. Steffanic:

The National Association of Clinical Nurse Specialists (NACNS) represents the interests of over 72,000 Clinical Nurse Specialists (CNSs) in the United States. NACNS appreciates the opportunity to offer comments on behalf of our PA members regarding proposed Regulation #16A-5133 (Clinical Nurse Specialists).

Our recommendations are intended to clarify the language of the regulations, but not to modify the intent. In addition we have offered some comments that pertain to the administrative aspects of these regulations.

#### **Comments on the Preamble**

21.811      Para 3 line 5  
Page 2 of 16

“...Board anticipates that, among others, the  
Oncology Nursing Certification Corporation...”

Page 3 of 16      Para 8 line 1

Revise the language of the third example that pertains to ANCC certified CNSs who have a bachelor’s degree in nursing and a master’s degree in psychology. For clarity, we recommend this substitution: Third, the nurse holds a current national certification as a Clinical Nurse Specialist from the American Nurses Credentialing Center (ANCC), having been initially certified at a time when ANCC offered certification to nurses who held a bachelor’s degree in nursing and a master’s degree in a related specialty.

21.823  
Page 4 of 16      Para 1 line 3

“...has completed 30 clock hours...”

#### **Comments on the Proposed Regulations**

21.801  
Page 7 of 16

Add the definition of “Accepted” to mean recognized by the

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Board rather than use the term “Approved” to indicate that the Board accepts or recognizes a program or a certifying body, etc.

Eliminate approved program and substitute accepted for those programs that the Board recognizes.

Use “approved” to indicate Board approval of PA offerings.

21.811

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Subsection (1)(i)

Line 5: Substitute the National Organization for Competency Assurance (NOCA) in place of the National Council of State Boards of Nursing (NCSBN).

*Rationale: ABNS and NOCA are the recognized accreditors of nursing certification agencies. NCSBN is the membership association for State Boards of Nursing, and as such, is not in a position to set standards for or accredit of nursing certification agencies.*

line 8 add nursing to post master’s degree and post master’s certificate.

21.811

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(2) line 3 post master’s nursing degree

(B) delete original and add For a CNS who is not eligible to take a National Certification examination in the CNS specialty area or in an area that encompasses the CNS specialty area, the CNS may demonstrate eligibility through validation by a Board accepted national nursing, nursing specialty or credentialing organization within the past three years or recertification if the certification or other process occurred more than three years ago.

(C) Add A CNS may demonstrate eligibility by submitting the appropriate document(s) and fees to a Pennsylvania approved CNS program for review and critique. The review and full critique shall be submitted directly to the Board as well as to the applicant.

21.812  
Page 11 of 16

Para 1 (b) line 1 insert or additional between “change of “and  
“clinical specialty area.”

21.813  
Page 11 of 16

Subsection (d)(1) Add: If an applicant is unable to obtain an official transcript and verification of the degree awarded and course work in the specialty from the CNS program, the Board will accept reasonable alternative or equivalent verification such as the school bulletin, records provided by a classmate, records provided by the state board of nursing in the state where the program was offered.

*Rationale: This accounts for circumstances in which a program has closed or records have been destroyed.*

Addition wherever appropriate

Specify that a nurse will be eligible to apply for Board certification as a CNS for two years after the final publication of these regulations

21.822  
Page 12 of 16

(d) line 1 insert clock after 30  
line 2 insert immediately between “years” and “prior”

21.827  
Page 15 of 16

(f) add and RN number at the end of the sentence  
(c) line 2 add including hours and portions of hours or courses at the end of the sentence

21.828  
Page 15 of 16

(a) (3) begin line with Number of

### Other Comments

21.805  
Page 8 of 16

Add and are non-refundable to (a)

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Add Each review of a proposal (cost to be calculated)

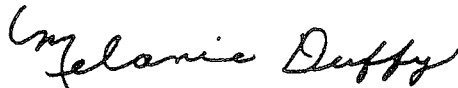
Add (c) No action shall be taken until all documents and fees are received

21.813  
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(f) line 2 after “within 12 months” add from the first date of application

As representatives of the NACNS Board of Directors, Legislative/Regulatory Committee and PA members, we thank you for your consideration of these comments and recommendations. We would be happy to discuss our comments or answer questions. Please contact NACNS Chief Executive Officer, Christine Filipovich for further discussion.

Sincerely,



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Critical Care Clinical Nurse Specialist  
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