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INDEPENDENT REGULATORY
REVIEW COMMISSION

#2700

July 09, 2008

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

Dear Ms. Stefanic:

Thank you for this opportunity to present the views of the Pennsylvania State Nurses Association (PSNA) in regard to proposed Regulation #16A-5133 (Clinical Nurse Specialists). PSNA encourages the Board to consider the following recommendations:

1. In the preamble, Strike §21.811(2)(iii) beginning with “Third,” and ending with “certifying examination.” PSNA 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).

This statement is more concise and will eliminate confusion/debate over the MSN requirement by allowing those CNSs who were ANCC-certified prior to the ANCC eligibility changes in the late 1970s to be grandfathered.

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.

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

PSNA recommends that other documentation of curriculum be acceptable in cases where official transcripts are not available. For example, a CNS that attended a nursing program that closed many years ago would not have access to official transcripts.

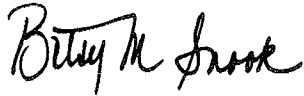
4. PSNA recommends that in §21.813(f) strike the words “12 months,” and replace with: 18 months from the date of first application.

This will allow CNSs adequate time to get in compliance with these regulations prior to losing their ability to practice.

Again, PSNA appreciates 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 PSNA's comments, please feel free to contact me at (717) 657-1222 ext. 200 or by email at bsnook@panurses.org.

Sincerely,

A handwritten signature in black ink that reads "Betsy M. Snook". The signature is written in a cursive, flowing style.

Betsy M. Snook, M.Ed, BSN, RN
Chief Executive Officer
PA State Nurses Association