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**Testimony before the  
Independent Regulatory Review Commission  
Annex A  
Pennsylvania Code  
Title 49. Professional and Vocational Standards  
Part I. Department of State  
Subpart A. Professional and Occupational Affairs  
Chapter 21. State Board of Nursing  
Subchapter H. Clinical Nurse Specialists**

**Presented by  
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**June 3, 2010**

Good morning distinguished members of the Independent Regulatory Review Commission. My name is Melanie Duffy and I am a Clinical Nurse Specialist (CNS) practicing for the past 22 years in Critical Care at Pinnacle Health System here in Harrisburg.

I supported the CNS Title Protection Bill that was signed into law in July of 2007 and I support the CNS regulations that are being discussed today. Title Protection was a critical issue for practitioners because important services provided by Clinical Nurse Specialists were recognized and validated. The regulations will provide structure and substance to operationalize the Title Protection law.

Clinical Nurse Specialists are included in the four categories of Advanced Practice Nurses along with Nurse Practitioners, Certified Registered Nurse Anesthetists, and Certified Nurse Midwives. CNSs are also registered nurses with advanced nursing degrees—master's and/or doctorate—who are expert clinicians in specialized areas of practice. CNSs perform role functions that are beyond those of the registered nurse and use expertise in cases of greater severity and complexity. Clinical Nurse Specialists maintain a high level of clinical nursing expertise in the assessment,

identification, and treatment of complex responses to health problems of individuals, families, or communities.

Clinical Nurse Specialists have a direct and positive effect on Pennsylvania's health care systems, particularly on *cost-effective* and *quality* patient care. CNSs fulfill a professional and societal mandate by using clinical evidence to change nursing practice to improve clinical and economic outcomes. CNSs advance nursing practice by serving as expert clinicians who assure nursing interventions are based upon the most current evidence. Clinical Nurse Specialists incorporate new knowledge into practice and support innovative nursing interventions and therapies. CNSs work collaboratively with nurses and other health care providers to provide quality, cost-effective outcomes for individuals, groups, the underserved, underinsured, and uninsured citizens of the Commonwealth.

Approving the Clinical Nurse Specialist regulations being discussed here today will provide the Commonwealth of Pennsylvania with a knowledgeable, competent, and advanced health care resource. Clinical Nurse Specialists are the clinical innovation experts that will play an integral role in health care reform at the state and national level.

Thank you again for your time as you evaluate these critically important regulations.