



**CALIFORNIA
HOSPITAL
ASSOCIATION**

*Providing Leadership in
Health Policy and Advocacy*

October 15, 2018

Dean Fairbanks
Regulations Coordinator
Board of Registered Nursing
1747 N. Market Blvd., Suite 150
Sacramento, CA 95834
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BY ELECTRONIC CORRESPONDENCE

RE: Comments on Proposed Modifications to the Text for Title 16, Article 8, Standards for Nurse Practitioners

Dear Mr. Fairbanks:

The California Hospital Association (CHA) is the statewide leader representing the interests of hospitals and health systems in California with the Legislature, Administration and regulatory agencies. As one of the largest trade associations in the nation, CHA's vision is an optimally healthy society, where every Californian has equitable access to affordable, safe, high-quality medically necessary health care. On behalf of more than 400 member hospitals and health systems, CHA respectfully offers the following comments for consideration for the "pre-notice public discussion" prior to the opening of the formal rulemaking process for Title 16, Article 8, Standards for Nurse Practitioners.

The APRN workforce, and their ability to practice to the full extent of their education and training, is a key factor in the state's ability to improve access to care and promote delivery system transformation for the more than 2.7 million additional California state residents who have enrolled in Medi-Cal since the program was expanded. With that, it is imperative that nurse practitioners are well educated and competent to provide care, and, their professional competencies and state mandated regulations reflect contemporary practice.

CHA is appreciative of the extensive work done by the BRN and the BRN Nurse Practice Committee to update the definitions, categories NP use of title, and standards of education. These changes reflect a positive step forward reflective of current APRN practice based on the foundational work of the "2008 National Council of State Boards of Nursing (NCSB) Consensus Model for APRN Regulation: Licensure, Accreditation, Certification and Education," a pivotal document that provides guidance for all states to adopt uniformity in the regulation of APRN roles.

CHA supports raising APRN certifying standards to include certification and examination by an accredited certifying organization. This is consistent with the APRN Consensus Model and their recommendation for APRNs to hold a national certification by an accrediting certifying agency as a requirement for practice. While this requirement currently applies to nurse anesthetists in California, it does not apply to APRNs. California is one of only four states which currently do not require passage of a

national certification exam for an APRN to enter into practice. This certification ensures that APRNs have the minimum level of knowledge needed to safely enter into practice and provide quality care to the public.

CHA strongly endorses APRNs holding national certification not only to ensure competency, but to help streamline the credentialing process so APRNs can enter the workforce more quickly. The national certification would also meet CMS reimbursement requirements and help streamline credentialing processes so APRNs may enter the workforce more quickly. Additionally, the proposed regulation would enable reimbursement in programs such as Medicare, Medi-Cal, Tricare and others, so APRNs may effectively provide critical health care services in medically underserved areas of our state.

While the BRN did not chose to mandate national certification, CHA agrees with the optional provision as presently outlined in the proposed language in Section 1482 - Requirements for Certification as a Nurse Practitioner. We encourage the BRN to continue to move in this direction so California is consistent and current with national accrediting standards.

In addition to using the APRN Consensus Model updated terminology and certification inclusion, the NPC proposed changes to the regulations using qualified organizational standards such as the National Organization for Nurse Practitioner Faculties is commended by our CHA members. Accreditors use these organizational standards to accredit NP programs across the country. California should be consistent and current with national accrediting standards and CHA strongly supports the staff proposed changes made throughout the regulations.

Significant health care changes are driving the need to improve access to care through modernization of the regulations guiding professional practice. CHA firmly believes that the NPC proposed changes are in the best interest of Californians and encourages the California Board of Registered Nursing to fully endorse these changes through the formal rulemaking process.

Sincerely,



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