



**CALIFORNIA
HOSPITAL
ASSOCIATION**

*Providing Leadership in
Health Policy and Advocacy*

October 8, 2015

California Board of Registered Nursing
Attn: Janette Wackerly, RN,BSN, MBA
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1747 North Market Blvd., Suite 150
Sacramento, CA 95834

BY ELECTRONIC CORRESPONDENCE

**RE: PRE-NOTICE PUBLIC DISCUSSION FOR CALIFORNIA CODE OF
REGULATIONS, TITLE 16, ARTICLE 8, SECTIONS 1480-1486, STANDARDS
FOR NURSE PRACTITIONERS PROPOSED REGULATIONS**

Dear Ms. Wackerly:

The California Hospital Association 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, the California Hospital Association (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.

The present standards for nurse practitioner regulations were adopted between 1979-1985. Much of the content of Article 8 is no longer relevant and needs updating in areas of Definitions, Categories, NP use of title, and, Standards of Education. The BRN Nurse Practice Committee (NPC), comprised of board staff, has proposed changes reflective of current APRN practice based on foundational work of the "2008 National Council of State Board's 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. In 2008, there was mounting awareness nationally on the important role the APRN's can play in improving access to high quality, cost effective care. However, the lack of common definitions regarding the APRN roles, increasing numbers of nursing specializations, debates on appropriate credentials and scope of practice, along with lack of uniformity in

educational and state regulations, has limited the ability of patients to access APRN care. The APRN Consensus Model Document addresses these issues and has been widely used across the nation. The NPC has used this document as a springboard to propose necessary changes to California's outdated APRN regulations.

CHA supports raising APRN certifying standards to include recommendations by the NPC, including certification and examination by an accredited certifying organization as outlined in suggested revision of Section 1482 Requirements for Certification as a Certified Nurse Practitioner. This is consistent with the APRN Consensus Model and their recommendation for APRN's 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 APRN's. 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 APRN's have the minimum level of knowledge needed to safely enter into practice and provide quality care to the public.

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

In addition to using the APRN Consensus Model, the NPC proposed changes to the regulations using qualified organizational standards such as the National Organization for Nurse Practitioner Faculties and the National Task Force (NTF). 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.

/s/

BJ Bartleson, RN, MS, NEA-BS
Vice President, Nursing and Clinical Services

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