

The American Association of Critical-Care Nurses (AACN) submits the following comments to the OMB and SOC based on the May 22, 2008 notice in the Federal Register.

We strongly urge the OMB and SOC to re-examine the categories of advanced practice nurses in the proposed 2010 SOC listing to include Clinical Nurse Specialists (CNS) for the following reasons:

- Any action taken to exclude the CNS as advanced practice is inconsistent with state and national definitions of advanced practice registered nurse (APRN) which includes all four categories: Nurse Practitioner, Nurse Anesthetist, Nurse Midwife and Clinical Nurse Specialist.
- The action to exclude the CNS is also inconsistent with the SOC Coding Guidelines as listed in the Federal Register, page 29932, #2 – “When workers in a single job could be coded in more than one occupation, they should be coded in the occupation that requires the highest level of skill”. The CNS by definition requires a Master’s level degree in nursing which is above and beyond that required for entry into nursing practice. Additionally, the skill set required for function in the CNS role demands training and competence in areas such as research, systems management and education not acquired by the entry-level nurse.
- Item #3 of the Coding Guidelines states “Data collection and reporting agencies should assign workers to the most detailed occupation possible.” A description of clinical nursing practice does not adequately describe in appropriate detail the role of the Clinical Nurse Specialist. Including the CNS under the category of registered nurse does not recognize either their contributions to the advancement of nursing science OR research to support nurse-sensitive indicators and outcomes currently under review by Medicare and third party payers, such as ventilator-associated pneumonia, pressure ulcers, hospital-acquired infections and patient safety.
- Exclusion of the CNS as an advanced practice category is confusing to the public, health care system and third party payers, regulatory agencies, patients and families and other stakeholders, and legislators. This would impact the ability to qualify for reimbursement for their services, government research grant monies, and government funding for the advanced education required to fill the role.

- Exclusion of the CNS is inconsistent with Medicare definition of the treating practitioner based upon the services provided by the clinical nurse specialist as noted below:

Medicare Benefit Policy Manual

Chapter 15 – Covered Medical and Other Health Services

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Treating Practitioner

- A “treating practitioner” is a nurse practitioner, **clinical nurse specialist**, or physician assistant, as defined in §1861(s)(2)(K) of the Act, who furnishes, pursuant to State law, a consultation or **treats a beneficiary for a specific medical problem, and who uses the result of a diagnostic test in the management of the beneficiary’s specific medical problem.**

As the largest specialty nursing organization in the world, the American Association of Critical Care Nurses represents acute and critical care nurses from entry level to advanced practice. The AACN Certification Corporation, the credentialing arm of AACN, awards advanced practice certification for the CNS role which is currently recognized by 30 states and the District of Columbia.

Thank you for your attention.



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