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Response from the Oncology Nursing Society Regarding the National Council of State Boards of Nursing Draft Vision Paper: The Future Regulation of Advanced Practice Nursing

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The Oncology Nursing Society (ONS), recognizing the urgent need to respond to the draft vision paper developed by the National Council of State Boards of Nursing (NCSBN)*, offers the following comments as a beginning point in our discussion of the issues surrounding the regulation of advanced practice nursing. The ONS Board of Directors has authorized the release of this response, acknowledging that a more complete response is called for and it will be necessary to further develop these ideas with appropriate supporting evidence.

ONS is a specialty nursing organization with more than 33,000 members, dedicated to advancing the oncology-nursing specialty and improving the care of people with cancer. ONS is committed to education of nurses and to recognition of the advanced practice role within the specialty of oncology nursing. The recommendations contained in the NCSBN's vision paper run counter to views and values of the members of ONS, particularly the ONS Special Interest Groups for Clinical Nurse Specialists (CNS SIG) and Nurse Practitioners (NP SIG).

ONS is opposed to the recommendations proposed in the NCSBN vision paper, and adds its voice to the growing list of nursing organizations opposing the proposal. Below is a summary of our rationale for opposing the recommendations:

- The essence of advanced practice nursing is specialization. Although the NCSBN paper acknowledges that competency in a specific population or specialty area could be acquired through education, such competencies are not included in the recommended core curriculum.
- The Clinical Nurse Specialist (CNS) role would be diminished by implementing the NCSBN's recommendations because it would no longer be recognized for licensure as an advanced practice role and would lose the title protection afforded by licensure.
- The nursing profession is responsible for defining nursing practice and advanced nursing practice through scope and standards models and by outlining the educational preparation needed to meet those standards. As a voluntary advisory body to State Boards of Nursing, the NCSBN has neither the authority nor the mandate to redefine nursing practice.
- The vision paper proposes to define advanced practice nursing as having a scope outside of nursing practice in order to be eligible for a second license in advanced practice nursing.

Core Values: Integrity, Innovation, Stewardship, Advocacy, Excellence, Inclusiveness

The ONS mission is to promote excellence in oncology nursing and quality cancer care

- Proposals in the vision paper may open up individual state's nurse practice acts leaving them vulnerable to adverse changes at a time when medicine is actively lobbying to limit the authority of advanced practice nurses and other healthcare professionals.
- NCSBN, as a participant in the national collaborative effort, APRN Consensus Work Group, has collaborated with other professional nursing groups to recommend a process for defining and validating CNS and NP core and specialty competencies. Yet, it negates this work by recommending separate, unilateral recommendations.
- The proposed re-titling only of CNSs who currently have prescriptive authority fails to protect public health by creating an arbitrary distinction among existing advanced practice nurses whose prior education was determined according to evidence-based national nursing standards already in place.
- Realization of the recommendations contained in the NCSBN vision paper would limit consumer choice with respect to the advanced nursing care already being provided by CNSs working within the scope of nursing practice and could affect third party reimbursement for CNS services.
- The vision paper recommends a curriculum and licensing process that have not undergone a process of validation by a broad consensus among professional nursing groups.
- Current specialties, including oncology nursing, arose out of the need for education and certification in specialty areas. Advanced practice within these specialties is essential to quality nursing care.
- With such a short timeline allowed for comments there is not adequate time for consultation among stakeholders. Such a dialogue needs to occur prior to proposing such profound changes in practice.
- Advanced oncology nurses, specifically CNSs, are nationally recognized for their expertise as evidenced by research, publications and contributions to practice.
- Eliminating a whole group of advanced practice nurses in their current CNS roles may be generally detrimental to the provision of health care as nursing struggles to meet the growing needs of an aging population with chronic illness and a shrinking nursing workforce.

ONS is committed to achieving a broad consensus in the nursing community regarding the future role of advanced practice nurses. We appreciate the opportunity to offer comments and we look forward to further dialogue.

* National Council of State Boards of Nursing Vision Paper: the Future Regulation of Advanced Practice Nursing, 2006, available at http://www.nacns.org/02_17_06%20APRN%20Vision%20Paper.pdf