



May 20, 2003

Steven C. Cook, Director
Division of Disability, Aging &
Rehabilitative Services
Family & Social Services Administration
402 West Washington Street
Indianapolis, IN 46204

Dear Mr. Cook:

Re: Proposed Rule LSA 02-326
(Amends 460 IAC 6)

In reviewing the proposed rule I have noted that Psychiatric/Mental Health Clinical Nurse Specialists have not been included.

Psychiatric Clinical Nurse Specialists (CNSs) are advanced practice registered nurses [IC 25-23-1-1-(b)-(3) and 848 IAC 4-3-1] with a master's degree in psychiatric/mental health nursing.

They:

- Counsel individuals, families, and groups in a variety of settings.
- Assess and manage client's physical and emotional needs.
- Prescribe medications (if granted prescriptive authority by the IN State Board of Nursing [IC 25-23-1-19.5 and 848 IAC Article 5]) and monitor the client's responses to medication.
- Consult, provide, and facilitate systems analysis with groups and organizations.

The following are recommendations for amending the proposed rule:

- A. 460 IAC 6-3-56 "Therapy services" defined
Authority: IC 12-8-8-4; IC 12-9-2-3; IC 12-11-1.1-9; IC 12-11-2.1-12
Affected: IC 12-11-1.1; IC 12-11-2.1; IC 25-33-1.5.1

Add:

"Clinical Nurse Specialist with a masters degree in psychiatric/mental health nursing pursuant to IC 25-23-1-1(b)(3) and 848 IAC 4-3-1"

- B. 460 IAC 6-5-4 Behavioral support services provider qualifications
Authority: IC 12-8-8-4; IC 12-9-2-3; IC 12-11-1.1-9; IC 12-11-2.1-12
Affected: IC 12-11-1.1; IC 12-11-2.1; IC 25 23.6; IC 25-33-1.5.

In Section 4 (a) (1) The word "or" should be left in. As I read it, if "or" is removed, only a licensed psychologist with an endorsement as a health service provider in psychology would be approved as a Level I clinician.

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- C. 460 IAC 6-5-4 Behavioral support services provider qualifications
Authority: IC 12-8-8-4; IC 12-9-2-3; IC 12-11-1.1-9; IC 12-11-2.1-12
Affected: IC 12-11-1.1; IC 12-11-2.1; IC 25-33-1.5.

In Section 4 (c)(1) insert new (E) to read: "(E) be a registered nurse with a master's degree in psychiatric mental health nursing;"

Re 460 IAC 6-14-4 Training
Authority: IC 12-8-8-4; IC 12-9-2-3; IC 12-11-1.1-9; IC 12-11-2.1-12
Affected: IC 12-11-1.1; IC 12-11-2.1

Section 4(c)(1): Although this provision is the current rule, the administration of medications, monitoring of side effects, and recognition and prevention of medication interactions seems to be the scope of practice of a licensed health care provider—not part of the scope of an unlicensed care giver.

Thank you for considering the above recommendations. If you have any questions, please feel free to contact me.

Sincerely,

Ernest C. Klein, Jr., CAE
Executive Director
Indiana State Nurses Association

ECK/sfd

cc Sandra D. Fights, MSN, RN, President
Indiana State Nurses Association