

July 21, 1997

David J. Rubben, Legal Counsel, Secretary
United Behavioral Health
300 Opus Center
990 Bren Broad East
Minnetonka, Minnesota 55343

Dear Mr. Rubben:

I write at the request of some clinical nurse specialists (CNS) who have complained about the United Behavioral Health (UBH) credentialing process. The clinical nurse specialists have indicated that UBH has refused to expand its network to include clinical nurse specialists in Rhode Island.

As you may know, clinical nurse specialist are one of the older categories of nurse specialty practice. As CNS, nurses educate clients, provide assistance to other nurses in diagnosing and prescribing care and may practice independently. In approximately thirty (30) states, the CNS is considered an advanced practice nurse who may provide care independently within her scope of practice. CNS are recognized by statute as advanced practice nurses in Rhode Island, with an educational requirement of a minimum of a masters degree in nursing or a related field, such as counseling, psychology or other research-oriented programs. This group is so well recognized that numerous journals, publications and nursing standards have been developed articulating the scope of this practitioner.

Although state law does not require that UBH hire advanced practice nurses, we ask that you recognize that there are a number of state statutes which recognize the advanced practice nurse as an authorized provider to obtain reimbursement. While state statute does not mandate that you duplicate services, please be advised that UBH's failure to include or acknowledge clinical nurse specialists who have been in practice and have an existing client base is a direct assault on the rights of the consumer, especially given the fact that the care provided and care costs are comparable. I've enclosed a listing of states which recognize clinical nurse specialists as advanced practice nurses for your review. I ask that you review the UBH credentialing process and decision not to hire advanced practice nurses in relation to the differing state requirements related to reimbursement. The requirements for clinical specialist regulation in Rhode Island differ from that in Minnesota (which differs from other states).

Should you wish to review the state law as well as look at the larger issue of placing

advanced practice nurses on UBH's provider panels, please feel free to contact me, Windy Carson, Nurse Practice Counsel, at (202) 651-7061 or Sarah Stanley, MSN, RN, CS, Director of Practice, at (202) 651-7066.

Sincerely,

Winifred Y. Carson, Esq.
Nurse Practice Counsel

cc: Barbara Sapin, General Counsel
Sarah Stanley, Director, Practice
Terri Gaffney, Director, State Government Relations

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