



September 20, 2016

Standard Occupational Classification Policy Committee
U.S. Bureau of Labor Statistics, Suite 2135
2 Massachusetts Avenue, NE
Washington, DC 20212
Submitted electronically to soc@bls.gov

RE: 2018 SOC

Dear Members of the Standard Occupational Classification Policy Committee:

The Oncology Nursing Society (ONS) and the Oncology Nursing Certification Corporation (ONCC) appreciate the opportunity to provide feedback on your recommendations regarding the 2018 Standard Occupational Classification. **We urge the SOCP to (1) exclude the Clinical Nurse Specialist (CNS) from the broad occupation group Registered Nurses (RN), and (2) include the CNS as a broad occupation and detailed occupation in the 2018 SOC revisions currently under consideration.** Our rationale follows.

Advanced practice RNs (APRNs) in oncology provide leadership to improve outcomes for patients with cancer and their families by improving patient outcomes and quality of life, increasing healthcare access, ensuring nursing clinical excellence, and increasing the cost effectiveness of care. In the *Consensus Model for APRN Regulation* (APRN Consensus Work Group & National Council of State Boards of Nursing APRN Advisory Committee, 2008), APRNs are defined as nurses who have completed an accredited graduate-level education program preparing them in one of four defined roles: clinical nurse specialist (CNS), certified RN anesthetist, certified midwife, or certified nurse practitioner (NP).

APRN practice in oncology includes CNSs, NPs, and dually prepared (CNS and NP) nurses who are prepared at the graduate level (i.e., master's or doctorate) and have additional education and/ or experience in oncology practice.

Under its Medicare payment and coverage policies, the Centers for Medicare and Medicaid Services (CMS) recognize CNSs as APRNs. This summer, the Department of Veterans Affairs (VA) proposed amending its medical regulations to permit full practice authority for all VA APRNs, including CNSs, when they are acting within the scope of their VA employment.

Retaining CNSs in the RNs 2010 classifications is inconsistent with federal agencies, with nursing practice in the states, and with the larger nursing community, all of which distinguish CNSs as advanced practice registered nurses (APRNs).

We appreciate the opportunity to comment on this 2018 SOC. ONS and ONCC look forward to continuing dialogue on these important issues. If you have any questions about our comments, please contact Alec Stone, MA, MPA, ONS Director of Health Policy, at astone@ons.org.

Sincerely,

The Oncology Nursing Society
The Oncology Nursing Certification Corporation

About ONS

The Oncology Nursing Society (ONS) is a professional organization of over 39,000 registered nurses and other healthcare providers dedicated to excellence in patient care, education, research, and administration in oncology nursing. ONS members are a diverse group of professionals who represent a variety of professional roles, practice settings, and subspecialty practice areas. Oncology nurses are leaders in the healthcare arena, committed to continuous learning and leading the transformation of cancer care by advocating for high-quality care for people with cancer.

About ONCC

The Oncology Nursing Certification Corporation (ONCC) is a non-profit organization that develops, administers, and evaluates programs for certification in oncology nursing. ONCC was incorporated in 1984 and is governed by a Board of Directors, who represent various levels of certification in oncology nursing and the public at large. ONCC administered its first certification examination, the Oncology Certified Nurse (OCN[®]) examination in 1986. Today, ONCC offers eight credential programs. More than 36,000 nurses are currently certified by ONCC.