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TO: Dan Zimmerman, Contract Administrator
Bureau of Prevention, Treatment and Recovery
FROM: Gina Dennik-Champion, WNA Executive Director
DATE: November 14, 2008
RE: Proposed Outpatient Mental Health Clinic Rule HFS 35

The Wisconsin Nurses Association (WNA) appreciates the opportunity to comment on the proposed outpatient mental health clinic rule HFS 35. I want to first express, on behalf of WNA our support for the creation of HFS 35. The current sets of rules are in dire need of revision. WNA is also aware that this seven year plus work has been an arduous process and wish to convey our thanks for the time the bureau staff provided us during the development of the proposal. WNA is supportive of the inclusion and the utilization of advanced practice nurses as described in HFS 35. We specifically support the following:

HFS 35.03(1) Definition of advanced practice nurse and definition (1g) advanced practice nurse prescriber. Provides for the inclusion of advanced practice nurses who do or do not have prescriptive authority as defined in Ch. 441.16 and Administrative Code N 8.

HFS 35.03(4) Definition of clinical collaboration. Provides enough clarity when compared to the definition of collaboration under Administrative Code N8.10.

HFS 35.03(10) Definition of Mental health Practitioner. Provides for the inclusion of nurses with 3,000 hours of supervised clinical post-graduate degree experience including 1,000 hours of face-to-face contact with consumers.

HFS 35.03(11) Definition of Mental Health Professional. Provides for the inclusion of advanced practice psychiatric mental health nurse as a “recognized psychotherapy practitioner”.

HFS 35.03(16) Definition of Prescriber includes advanced practice nurse prescriber.

HFS 35.03(17r) Definition of Recognized psychotherapy practitioner. Provides for the inclusion of advanced practice psychiatric mental health nurse who meet the qualifications as determined by the State of Wisconsin Board of Nursing.

Thank you again for providing us the opportunity to share our support of these sections of HFS 35. We look forward to the adoption of these rules.