

I am submitting a comment for consideration by the SAFE Commission in their proposed emergency legislative rule 149 CSR 11.

The emergency rule includes, in the §149-11-2.5 definition of 'health care professional' to describe who is eligible to conduct medical forensic examinations, licensed practical nurses. According to the *National Protocol for Sexual Assault Medical Forensic Examinations* (U.S. Department of Justice 2013), and the International Association of Forensic Nurses, only registered nurses and advanced practice nurses are eligible to become sexual assault nurse examiners. Therefore, I am requesting that 'licensed practical nurses' be removed from the definition. That removal could then allow the removal of the definition in 2.8 of 'licensed practical nurse.'

Also, an inconsistency exists in the terminology used in various sections of the code referencing those conducting forensic exams. The Sexual Assault Forensic Examination Commission section of the existing code in §15-98-4 (a) uses 'health care provider,' section §15-98-2 (4) uses 'qualified health care provider,' and section §15-98-4 (b) (3) uses 'trained health care provider.' The emergency legislative rule 149CSR11 in section §149-11-5 utilizes 'health care professional' and in §149-11-3.3.1 uses 'qualified medical provider.' The Sexual Assault Victims Bill of Rights in §61-11a-9 (2) uses 'qualified medical provider.' Currently, only two terms are defined in any section: 'health care professional' and 'qualified medical provider.' Both are in the emergency legislative rule. It would provide more clarity and reduce confusion if consistent terminology were used and defined.

My thanks to the SAFE Commission for their consideration of this suggestion.

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