



TO: The Professional Practice Committee

FROM: Douglas E. Lentivech


SUBJECT: Proposed Amendment to the Regulations of the Commissioner of Education Relating to the Certification of Clinical Nurse Specialists and Nurse Practitioners under Article 139 of the Education Law

DATE: September 8, 2014

AUTHORIZATION(S):


SUMMARY

Issue for Decision

Should the Board of Regents amend section 52.12 and approve the addition of section 64.8 of the Regulations of the Commissioner of Education to implement Chapter 364 of the Laws of 2013, relating to the certification of clinical nurse specialists, and amend section 64.4 of the Regulations of the Commissioner of Education to repeal obsolete regulatory provisions relating to the certification of nurse practitioners?

Reason(s) for Consideration

Required by State statute (L. 2013, Ch. 364) and review of policy.

Proposed Handling

The proposed rule will be presented to the Professional Practice Committee for recommendation and to the Full Board for adoption as a permanent rule at the September 2014 meeting of the Board of Regents. In addition, the proposed rule is also being presented for adoption as an emergency rule to ensure that the rule is in effect on September 27, 2014, which is the effective date of Chapter 364 of the Laws of 2013. A copy of the permanent rule, the emergency rule, and a Statement of Facts and Circumstances Which Necessitate Emergency Action are attached. Supporting materials are available upon request from the Secretary to the Board of Regents.

Procedural History

The proposed rule was discussed by the Professional Practice Committee at the March 2014 Board of Regents meeting. A Notice of Proposed Rulemaking was published in the State Register on April 16, 2014 for a 45-day public comment period. An Assessment of Public Comment is attached, however, no change in the proposed rule is recommended at this time.

Background Information

Chapter 364 of the Laws of 2013, which will become effective September 27, 2014, amended the Education Law to establish certification for clinical nurse specialists and to protect the title “clinical nurse specialist” and the designation “CNS” to ensure that only those properly educated and prepared to be clinical nurse specialists hold themselves out as such. The proposed amendment to section 52.12 and addition of section 64.8 to the Regulations of the Commissioner of Education implement the clinical nurse specialist certification requirements of Chapter 364.

The proposed amendment to section 52.12 of the Regulations of the Commissioner of Education establishes the requirements for clinical nurse specialist education programs. These requirements include registration, admission, curriculum and credential requirements for clinical nurse specialist education programs offered in New York State. The proposed amendment requires clinical nurse specialist education programs to be master’s degree, doctoral degree or post master’s certificate programs, which prepare graduates to practice as clinical nurse specialists. It also prohibits clinical nurse specialist education programs from being offered in New York State until they are registered by the Department.

The proposed amendment further requires clinical nurse specialist education program sponsors to ensure that each student holds a baccalaureate degree in nursing and an unrestricted license and current registration as a registered professional nurse in New York State prior to enrolling the student in any preceptorship, course or other activity that includes clinical practice.

Additionally the proposed amendment requires the curriculum of clinical nurse specialist education programs to include, in addition to the requirements of section 52.2(c) of the Regulations of the Commissioner of Education, clinical practice education of at least 500 hours, which must be supervised by a clinical nurse specialist, nurse practitioner or physician practicing in the specialty area of the clinical nurse specialist education program.

The proposed amendment establishes that, upon satisfactory completion of all components of a registered clinical nurse specialist education program, a certificate of completion must be issued to each individual by the education program sponsor.

Moreover, the proposed addition of section 64.8 to the Regulations of the Commissioner of Education establishes requirements for certification as a clinical nurse specialist, which include, but are not limited to, professional education and clinical experience requirements. The proposed rule requires an applicant for certification as a clinical nurse specialist to submit an application, together with the required fee, to the Department. It also requires the applicant to be currently licensed and registered in New York State and either a graduate of a clinical nurse specialist education program registered by the Department or able to meet alternative criteria acceptable to the Department relating to professional certification, education or clinical experience.

The proposed rule would also repeal certain regulatory provisions relating to nurse practitioner certification in section 64.4 of the Regulations of the Commissioner of Education, as those provisions no longer have any application.

Recommendation

It is recommended that the Board of Regents take the following action:

VOTED: That paragraph (3) of subdivision (b) of section 52.12 of the Regulations of the Commissioner of Education is added, subdivision (b) of section 64.4 is amended, paragraph (1) of subdivision (c) of section 64.4 is repealed and paragraphs (2) and (3) of subdivision (c) are renumbered as paragraphs (1) and (2), respectively, subdivision (d) of section 64.4 is repealed and subdivision (e) of section 64.4 is re-lettered as subdivision (d), and section 64.8 is added, as submitted, effective October 1, 2014; and it is further

VOTED: That paragraph (3) of subdivision (b) of section 52.12 of the Regulations of the Commissioner of Education is added, subdivision (b) of section 64.4 is amended, paragraph (1) of subdivision (c) of section 64.4 is repealed and paragraphs (2) and (3) of subdivision (c) are renumbered as paragraphs (1) and (2), respectively, subdivision (d) of section 64.4 is repealed and subdivision (e) of section 64.4 is re-lettered as subdivision (d), and section 64.8 is added, as submitted, effective September 27, 2014, as an emergency action upon a finding by the Board of Regents that such action is necessary for the preservation of the public health and general welfare in order to timely implement the requirements of Chapter 364 of the Laws of 2013.

Timetable for Implementation

If adopted at the September 2014 Regents meeting, the permanent rule will take effect on October 1, 2014 and the emergency rule will take effect on September 27, 2014 which is the effective date of Chapter 364 of the Laws of 2013.

AMENDMENT TO THE REGULATIONS OF THE COMMISSIONER OF EDUCATION

Pursuant to sections 207, 212, 6504, 6507, 6910, and 6911 of the Education Law and Chapter 364 of the Laws of 2013

1. Paragraph (3) of subdivision (b) of section 52.12 of the Regulations of the Commissioner of Education is added, effective October 1, 2014, to read as follows:

(3) Clinical nurse specialist education programs.

(i) Registration. A clinical nurse specialist education program is a master's degree, doctoral degree or post master's certificate program, which prepares graduates to practice as a clinical nurse specialist as permitted by section 6911 of the Education Law. No clinical nurse specialist education program shall be offered in this State until such program has been registered by the department.

(ii) Admission. A clinical nurse specialist education program sponsor shall ensure that each student holds a baccalaureate degree in nursing and an unrestricted license and current registration as a registered professional nurse in New York State prior to enrolling the student in any preceptorship, course or other activity that includes clinical practice.

(iii) Curriculum. The curriculum shall include, in addition to the requirements of section 52.2(c) of this Title, clinical practice education of at least five hundred hours which is supervised by a clinical nurse specialist, nurse practitioner or physician practicing in the specialty area of the clinical nurse specialist program.

(iv) Credential. Upon satisfactory completion of all components of the registered clinical nurse specialist education program, a certificate of completion of a course of study for clinical nurse specialists shall be issued to each individual by the education program sponsor.

2. Subdivision (b) of section 64.4 of the Regulations of the Commissioner of Education is amended, effective October 1, 2014, as follows:

(b) Professional study. To meet the professional education requirements for certification as a nurse practitioner in this State, the applicant shall present evidence of:

(1)....

(2)....

3. Paragraph (1) of subdivision (c) of section 64.4 of the Regulations of the Commissioner of Education is repealed, and paragraphs (2) and (3) of subdivision (c) are renumbered as paragraphs (1) and (2), respectively, effective October 1, 2014.

4. Subdivision (d) of section 64.4 of the Regulations of the Commissioner of Education is repealed, and subdivision (e) of section 64.4 is re-lettered as subdivision (d), effective October 1, 2014.

5. Section 64.8 of the Regulations of the Commissioner of Education is added, effective October 1, 2014, to read as follows:

§64.8 Clinical nurse specialist certification.

(a) Requirements for certification. An applicant for certification as a clinical nurse specialist shall:

(1) submit an application, together with the required fee, to the department;

(2) hold an unrestricted license and current registration to practice as a registered professional nurse in New York State; and

(3) present evidence, satisfactory to the department, of meeting all applicable professional education and experience requirements for certification as a clinical nurse specialist.

(b) Professional education and experience criteria. To meet the professional education and experience requirements for certification as a clinical nurse specialist in

this State, the applicant shall present evidence of having met the criteria in one of the four paragraphs below:

(1) completion of a clinical nurse specialist education program registered by the department; or

(2) completion of an education program determined by the department to be equivalent to a clinical nurse specialist education program registered by the department and current certification as a clinical nurse specialist by a national certifying body acceptable to the department; or

(3) holding a license or certification as a clinical nurse specialist issued by another state or country and meeting the substantial equivalent of the New York State requirements for certification, as determined by the department; or

(4) submitting an application and the required fee for certification as a clinical nurse specialist to the department prior to September 15, 2015 and satisfactorily meeting, as determined by the department, the criteria set forth in subparagraph (i) or (ii) of this paragraph prior to September 15, 2017:

(i) completion of a master's degree program in clinical nursing practice, which is determined by the department to be substantially equivalent to the preparation provided by a registered clinical nurse specialist education program, and completion, on or after January 1, 2011, of at least three thousand hours of clinical practice as a registered professional nurse in a clinical nurse specialty area in a general hospital licensed pursuant to article 28 of the Public Health Law; or

(ii) current certification as a clinical nurse specialist by a national certifying body acceptable to the department.

(c) Certificates.

(1) A clinical nurse specialist certificate issued to a registered professional nurse shall reflect the nurse's specialty area of clinical nurse specialist academic preparation.

(2) A registered professional nurse may apply for certification as a clinical nurse specialist in more than one specialty area of practice. A complete application and fee shall be required for each certificate.

ASSESSMENT OF PUBLIC COMMENT

Since publication of a Notice of Proposed Rule Making in the April 16, 2014 State Register, the State Education Department received the following comments:

1. COMMENT:

Concern was expressed regarding limitations on areas of practice. Including sub-specialization, beyond the traditional M&S, Family or Adult, Maternal & Child Health, and Psychiatric practice, has proven problematic in some jurisdictions. Pigeonholing CNSs [clinical nurse specialists] to a single subspecialty beyond the areas of education would place an undue burden on them and is not done for other professions.

DEPARTMENT RESPONSE:

Neither the Education Law nor the proposed regulations require the Department to certify clinical nurse specialists to be “subspecialized” in any practice areas. The Department will certify clinical nurse specialists to practice in four specialty areas: Pediatrics; Adult; Mental Health; and, Oncology, and will not issue clinical nurse specialists certificates in sub-specialty areas of practice (i.e., pediatric hematology or neuro-oncology).

2. COMMENT:

The proposed regulations do not specify which certifying bodies will be acceptable under §64.8(b) (4) (ii) to provide certification for the clinical nurse specialist (CNS) by a “national certifying body acceptable to the department.” The Department should consider the Oncology Nursing Certification Corporation and American Association of Critical-Care Nurses as national certifying bodies acceptable to meet the CNS certification requirement. These organizations are longstanding certifying bodies

that offer CNS certification with criteria acceptable to other states with similar legislation and certify CNS expertise within specialty areas, such as oncology and critical care.

DEPARTMENT RESPONSE:

The Department will certify Oncology Clinical Nurse Specialists and accept Oncology Clinic Nurse Specialist certifications from the Oncology Nursing Certification Corporation, and will certify Pediatric Clinical Nurse Specialists and Mental Health Clinical Nurse Specialists. The Department will also accept Pediatric Clinical Nurse Specialist certification and Psychiatric / Mental Health Clinical Nurse Specialist certification from the American Association of Critical-Care Nurses Certification Corporation.

3. COMMENT:

The Department should consider accepting a broader variety of nursing education programs (for example, a master's degree in nursing or a master's degree in nursing practice) to satisfy the education requirements for CNS certification.

The proposed §64.8(b)(4)(i) identifies the education requisite for licensure to be a "master's degree program in clinical nursing practice, which is determined by the department to be substantially equivalent to the preparation provided by a registered clinical nurse specialist education program." The commenter notes that its institution has successfully employed CNSs with varying advanced nursing degrees and which has been especially necessary given the nation-wide drop in CNS specific programs.

Nurses with a master's degree in nursing, coupled with the proposed amount of practice experience, should be eligible for licensure as a CNS to allow for those working in a role where the core components of the CNS (clinical practice, research, education, consultation, and leadership) are exemplified and verified to obtain CNS licensure to

allow those practicing as CNSs to be recognized based on their experience and practice.

Why specify, in §64.8(b)(4)(i), that the educational program must be a Master's program? Why exclude RNs [registered nurses] who have completed relevant post-Master's or doctoral programs from this provision?

DEPARTMENT RESPONSE:

Education Law §6911, which becomes effective on September 27, 2014, will authorize the Department to certify clinical nurse specialists to practice in a specialty practice area. Since the purpose of Education Law §6911, as added by Chapter 364 of the Laws of 2013, is to maintain safe patient care by ensuring that only those who are properly educated and qualified are performing clinical nurse specialist services, the proposed amendment requires all applicants to have advanced education in clinical nursing practice, such as a master's degree, doctoral degree or post master's certificate program which prepares graduates to practice as a clinical nurse specialist, in order to qualify for certification as a clinical nurse specialist.

4. COMMENT:

Will this certificate be worded as a "Clinical Nurse Specialist" or as a "Clinical Nurse Specialist in a *Specific Specialty*"? Only "Clinical Nurse Specialist" should be used.

DEPARTMENT RESPONSE:

Education Law §6911 will authorize the Department to certify clinical nurse specialists to practice in a specialty practice area. The Department will issue clinical nurse specialist certificates that identify the specific specialty practice area in which the holder of the certificate is certified.

5. COMMENT:

The commenter, citing §64.6, states it supports deleting all sections relating to Alternative Criteria for Certification as a nurse practitioner (NP) as these criteria were established many years ago to cover registered nurses who needed such alternatives and the criteria's timeframe ended in 2007.

DEPARTMENT RESPONSE:

The proposed regulations make no changes to §64.6, however, to the extent that the commenter is expressing support for the repeal of obsolete provisions relating to NP certification in §64.4, the commenter's support is noted.

6. COMMENT:

The Department should consider permitting registered nurses, who are not CNSs or NPs, but have a master's or doctoral degree in a nursing specialty, to supervise the clinical practice education of students enrolled in clinical nurse specialist education programs.

In addition, the proposed language in §52.12(b)(3(iii)) requiring the CNS curriculum include "clinical practice education of at least five hundred hours which is supervised by a clinical nurse specialist, nurse practitioner or physician practicing in the specialty area of the clinical of the clinical nurse specialist program" seems too narrow. There is currently a limited pool of certified CNSs to draw from in providing preceptors for CNS students, and the proposed regulation may impede CNS clinical education. Language should be added to include supervision by "another nurse with a master's or doctoral degree in nursing".

DEPARTMENT RESPONSE:

The intent of Education Law §6911 is to protect the title of clinical nurse specialist and to maintain safe patient care by ensuring that only those who are properly educated and qualified are performing clinical nurse specialist services. Registered professional

nurses who are not certified by the Department as CNSs or NPs may lack the knowledge, skill and experience to properly supervise the clinical practice education of a student enrolled in a clinical nurse specialist education program. The suggested change to the proposed amendment would be inconsistent with the law and therefore, no change is necessary.

7. COMMENT:

Clarification is sought regarding whether §64.8(b)(4) applies to all applicants for CNS certification. Also, the numbering of paragraphs in this section is incorrect.

DEPARTMENT RESPONSE

Section 64.8(b)(4) does not apply to all applicants, but applies only to those applicants who seek to qualify for CNS certification by fulfilling the professional education and experience criteria set forth in section 64.8(b)(4)(i) or (ii) by the dates specified. The proposed language provides sufficient clarification on this issue. In addition, the numbering of the paragraphs is correct. Therefore, no changes are necessary.

8. COMMENT:

In relation to requiring that the certificates specifically mention the clinical practice area, the profession has learned from its experience with such language in the nurse practitioner certificates, that being so specific can become a barrier to the advanced practice registered nurse's ongoing practice. The Department should consider seeking legislation to change the nurse practitioner section of the Nurse Practitioner Act, so that this level of specificity is no longer required for this advanced practice registered nurse.

DEPARTMENT RESPONSE:

The Department acknowledges the suggestion but currently has no plans to seek the proposed change.

9. COMMENT:

There may be an error in wording in 64.4(b) Professional study where it states “To meet the professional education requirements for certification *as a nurse practitioner* in this State...” it should be written as “To meet the professional education requirements for certification *as a clinical nurse specialist* in this State...”

DEPARTMENT RESPONSE:

The proposed regulations repeal obsolete provisions relating to the certification of nurse practitioners in §64.4, in addition to implementing the provisions of Chapter 364 of the Laws of 2013 relating to clinical nurse specialists. The reference to “nurse practitioner” in §64.4(b) is accurate since this provision applies only to nurse practitioners. Therefore no further changes are necessary.

10. COMMENT:

Will there be any “grandfathering” of clinical nurse specialists who are currently using the title and have the requisite educational credentials?

It appears §64.8(b)(4)(i) is intended to provide a grace period during which nurses may be certified who currently hold a master’s degree in a program that is not registered with the Department as a CNS program, but which provided preparation “substantially equivalent” to that provided by a registered CNS program (provided that the RN also has the specified clinical experience). However, this provision might also be read as providing a period during which nurses who do not currently hold a Master’s degree from a CNS or “substantially equivalent” program may be certified if they complete such a degree (and the specified clinical experience) before September 15, 2017. This latter interpretation would create some complication, however. An individual

could be certified as a CNS before completing graduate education - or even without actually enrolling in a graduate program. There would be no way to ensure, prior to September 15, 2017, that an individual has met any education or practice requirements.

Also, does “at least three thousand hours of clinical practice as a registered professional nurse in a clinical nurse specialty area” mean that the nurse must practice as a CNS, or practice as an RN in a specialty area in which CNSs practice (e.g., gerontology, pediatrics, critical care, etc.)? If the intent is to allow graduate-prepared RNs who are practicing as a CNS, or in roles that are similar to those of a CNS, to be certified - providing, essentially, a limited “grandfathering” period, that should be made clearer - either through revised language or other regulatory guidance.

DEPARTMENT RESPONSE:

The proposed amendment includes a “grandfather clause”, section 64.8(b)(4), which allows applicants two additional options for qualifying for CNS certification for a limited period of time. The Department believes that the deadline of September 15, 2017 for meeting education criteria under section 64.8(b)(4)(i) is reasonable, and that many registered professional nurses will complete a master’s degree prior to that date and qualify for CNS certification pursuant to proposed section 64.8(b)(4)(i).

Applicants who seek to qualify for CNS certification pursuant to section 64.8(b)(4)(i), will also be required to complete a form that describes their clinical practice experience. The Department intends to accept 3,000 hours of clinical practice as a registered professional nurse in a clinical nurse specialty area in a New York State general hospital as qualifying experience. The Department will accept experience in the following clinical nurse specialty areas: adult, pediatrics, mental health or oncology, and will review the form submitted to ensure that it meets the statutory and regulatory requirements for certification.

In addition, applicants under 64.8(b)(4)(ii) may meet certification requirements through current certification as a CNS by a national certifying body acceptable to the Department.

Certificates will be issued to applicants who seek qualification under 64.8(b)(4) when the applicant presents evidence of having met its criteria to the Department.

Although the “grandfather clause”, §64.8(b)(4) will expire after September 15, 2017, an applicant can always satisfy other education criteria set forth in §64.8(b) in order to qualify for certification as a clinical nurse specialist. The Department respectfully disagrees with the commenter who says the language is insufficiently clear. Therefore, no further changes are necessary.

STATEMENT OF FACTS AND CIRCUMSTANCES WHICH NECESSITATE
EMERGENCY ACTION

The proposed rule is necessary to implement Chapter 364 of the Laws of 2013, which added Education Law section 6911 and will become effective on September 27, 2014. The proposed rule establishes certification for clinical nurse specialists, and protects the title “clinical nurse specialist” and the designation “CNS”, in order to protect the public by ensuring that only those properly educated and prepared to be clinical nurse specialists perform clinical nurse specialist services.

Because the Board of Regents meets at fixed intervals, the earliest the proposed amendment can be presented for adoption, after expiration of the required 45-day public comment period provided for in State Administrative Procedure Act (SAPA) section 202(1) and (5), would be the September 15-16, 2014 Regents meeting. Furthermore, pursuant to SAPA section 203(1), the earliest effective date of the proposed amendment, if adopted at the September meeting, would be October 1, 2014, the date a Notice of Adoption would be published in the State Register. However, the provisions of Chapter 364 of the Laws of 2013 will become effective on September 27, 2014.

Therefore, emergency action is necessary at the September 2014 Regents meeting for the preservation of the public health and general welfare in order to ensure that the rule is in effect on the effective date of Chapter 364 of the Laws of 2013 so that the Chapter may be timely implemented.

AMENDMENT TO THE REGULATIONS OF THE COMMISSIONER OF EDUCATION

Pursuant to sections 207, 212, 6504, 6507, 6910, and 6911 of the Education Law and Chapter 364 of the Laws of 2013

1. Paragraph (3) of subdivision (b) of section 52.12 of the Regulations of the Commissioner of Education is added, effective September 27, 2014, to read as follows:

(3) Clinical nurse specialist education programs.

(i) Registration. A clinical nurse specialist education program is a master's degree, doctoral degree or post master's certificate program, which prepares graduates to practice as a clinical nurse specialist as permitted by section 6911 of the Education Law. No clinical nurse specialist education program shall be offered in this State until such program has been registered by the department.

(ii) Admission. A clinical nurse specialist education program sponsor shall ensure that each student holds a baccalaureate degree in nursing and an unrestricted license and current registration as a registered professional nurse in New York State prior to enrolling the student in any preceptorship, course or other activity that includes clinical practice.

(iii) Curriculum. The curriculum shall include, in addition to the requirements of section 52.2(c) of this Title, clinical practice education of at least five hundred hours which is supervised by a clinical nurse specialist, nurse practitioner or physician practicing in the specialty area of the clinical nurse specialist program.

(iv) Credential. Upon satisfactory completion of all components of the registered clinical nurse specialist education program, a certificate of completion of a course of study for clinical nurse specialists shall be issued to each individual by the education program sponsor.

2. Subdivision (b) of section 64.4 of the Regulations of the Commissioner of Education is amended, effective September 27, 2014, as follows:

(b) Professional study. To meet the professional education requirements for certification as a nurse practitioner in this State, the applicant shall present evidence of:

(1)....

(2)....

3. Paragraph (1) of subdivision (c) of section 64.4 of the Regulations of the Commissioner of Education is repealed, and paragraphs (2) and (3) of subdivision (c) are renumbered as paragraphs (1) and (2), respectively, effective September 27, 2014.

4. Subdivision (d) of section 64.4 of the Regulations of the Commissioner of Education is repealed, and subdivision (e) of section 64.4 is re-lettered as subdivision (d), effective September 27, 2014.

5. Section 64.8 of the Regulations of the Commissioner of Education is added, effective September 27, 2014, to read as follows:

§64.8 Clinical nurse specialist certification.

(a) Requirements for certification. An applicant for certification as a clinical nurse specialist shall:

(1) submit an application, together with the required fee, to the department;

(2) hold an unrestricted license and current registration to practice as a registered professional nurse in New York State; and

(3) present evidence, satisfactory to the department, of meeting all applicable professional education and experience requirements for certification as a clinical nurse specialist.

(b) Professional education and experience criteria. To meet the professional education and experience requirements for certification as a clinical nurse specialist in

this State, the applicant shall present evidence of having met the criteria in one of the four paragraphs below:

(1) completion of a clinical nurse specialist education program registered by the department; or

(2) completion of an education program determined by the department to be equivalent to a clinical nurse specialist education program registered by the department and current certification as a clinical nurse specialist by a national certifying body acceptable to the department; or

(3) holding a license or certification as a clinical nurse specialist issued by another state or country and meeting the substantial equivalent of the New York State requirements for certification, as determined by the department; or

(4) submitting an application and the required fee for certification as a clinical nurse specialist to the department prior to September 15, 2015 and satisfactorily meeting, as determined by the department, the criteria set forth in subparagraph (i) or (ii) of this paragraph prior to September 15, 2017:

(i) completion of a master's degree program in clinical nursing practice, which is determined by the department to be substantially equivalent to the preparation provided by a registered clinical nurse specialist education program, and completion, on or after January 1, 2011, of at least three thousand hours of clinical practice as a registered professional nurse in a clinical nurse specialty area in a general hospital licensed pursuant to article 28 of the Public Health Law; or

(ii) current certification as a clinical nurse specialist by a national certifying body acceptable to the department.

(c) Certificates.

(1) A clinical nurse specialist certificate issued to a registered professional nurse shall reflect the nurse's specialty area of clinical nurse specialist academic preparation.

(2) A registered professional nurse may apply for certification as a clinical nurse specialist in more than one specialty area of practice. A complete application and fee shall be required for each certificate.