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January 16, 2020

Centers for Medicare & Medicaid Services
Department of Health and Human Services
P.O. Box 8010
7500 Security Boulevard
Baltimore, MD 21244
Attention: Seema Verma, Administrator

Submitted via email to: PatientsOverPaperwork@cms.hhs.gov

Dear Administrator Verma:

On behalf of the National-Nurse Led Care Consortium (NNCC), I thank you for the opportunity to comment on regulatory changes resulting from Executive Order (EO) #13890: *Protecting and Improving Medicare for Our Nation's Seniors*. As an organization, NNCC supports nurse-led care and advocates for nurse leaders across sectors. NNCC applauds Section 5 of the EO for removing barriers to practice for a rapidly growing sector of the primary care workforce, nurse practitioners (NPs).

Nurses have unique skills and insight to treat the whole person, serving as a critical connection between compassionate and evidence-based healthcare. NPs are trained to provide high quality, cost-effective primary and specialty care, but too often unnecessary barriers and regulation prevent them from treating patients at their full scope of practice. Over 40 years of research has proven that NPs provide care of the same quality as their physician counterparts.¹ NPs are also more likely to work with underserved populations, including Medicare patients.² Removing outdated barriers to practice for NPs treating these patients will reduce costs and expand access to care.

We applaud CMS's initiative in removing unnecessary regulatory burdens on NPs' practice. As a member of the Nursing Community Coalition, NNCC recommends the following additional regulatory changes:

- Authorize NPs to certify patients for receipt of home health care.
- Update Medicare facility conditions of participation to authorize NPs to practice to the full extent of their education and clinical training in all settings. This includes eliminating physician supervision requirements for NPs working within their scope of practice.
- Consistent with Section 5(c) of the Executive Order, end reimbursement disparities and ensure that APRNs are appropriately reimbursed across all HHS programs for the work performed rather than their occupation.

¹ <https://www.ncbi.nlm.nih.gov/pubmed/22372080>

² <https://www.ncbi.nlm.nih.gov/pubmed/29047322>

NNCC believes that these recommendations would result in expanded access to care and reduced costs for Medicare patients in the United States. We commend CMS's focus on Section 5 of EO #13890 and appreciate the opportunity to comment. We look forward to continued collaboration in removing barriers that reduce access to high quality healthcare. Should you have any questions, you may reach me at shexem@phmc.org.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Hexem Hubbard".

Sarah Hexem Hubbard, Esq.
Executive Director
National Nurse-Led Care Consortium