



January 17, 2020

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244-1850

Dear Administrator Verma:

The Healthcare Leadership Council (HLC) appreciates the Centers for Medicare & Medicaid Services' (CMS) efforts to eliminate regulatory requirements that restrict scope of practice in the Medicare program.

HLC is a coalition of chief executives from all disciplines within American healthcare. It is the exclusive forum for the nation's healthcare leaders to jointly develop policies, plans, and programs to achieve their vision of a 21st century healthcare system that makes affordable high-quality care accessible to all Americans. Members of HLC – hospitals, academic health centers, health plans, pharmaceutical companies, medical device manufacturers, laboratories, biotech firms, health product distributors, post-acute care providers, home care providers, and information technology companies – advocate for measures to increase the quality and efficiency of healthcare through a patient-centered approach.

Currently, the scope of practice guidelines for nonphysician healthcare providers vary from state to state. This creates unnecessary barriers to the expansion of training programs. Nurse practitioners, physician assistants, other advanced practice providers, and personal care attendants should be allowed to practice to the full scope of their training and should be reimbursed for their services. The practice requirements should also be standardized across states. Additionally, the nurse licensure compact should be expanded to all 50 states so that registered nurses and licensed practical and vocational nurses are able to practice in other states without having to secure additional licenses. This will give nurses additional flexibility in their careers and help reduce the nursing shortage.

Also, CMS should eliminate the requirement that physicians sign home care orders. Nurse practitioners and other advanced practice providers are an important part of the healthcare team and therefore should be able to meet the face-to-face encounter requirement for ordering home care for patients without a physician being present to document that the encounter has occurred. These delays in treatment jeopardize the health of the patient and cause the Medicare program to incur additional costs by requiring the participation of additional providers with reimbursement rates higher than those of nurse practitioners.

Thank you for the opportunity to provide comments on eliminating regulatory burdens that restrict scope of practice in the Medicare program. HLC looks forward to continuing to engage with the administration on our shared priorities. If you have any questions or need additional information, please do not hesitate to contact Debbie Witchey at (202) 449-3435 or dwitchey@hlc.org

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary R. Grealy".

Mary R. Grealy
President