

July 6, 2018

The Honorable Eric Hargan
Acting Secretary
U.S. Department of Health & Human Services
200 Independence Avenue, SW
Washington, DC 20201

Re: Facilitation of the Public-Private Dialogue to Increase Innovation and Investment in the Healthcare Sector

Dear Secretary Hargan,

The American Association of Nurse Practitioners (AANP), representing more than 248,000 nurse practitioners (NPs) in the United States, appreciates the opportunity to provide comment on the HHS Request for Information on Promoting Healthcare Choice and Competition Across the United States.

NPs are advanced practice registered nurses (APRNs) who are prepared at the masters or doctoral level to provide primary, acute, chronic and specialty care to patients of all ages and walks of life. Daily practice includes: assessment; ordering, performing, supervising and interpreting diagnostic and laboratory tests; making diagnoses; initiating and managing treatment including prescribing medication and non-pharmacologic treatments; coordinating care; counseling; and educating patients and their families and communities. NPs practice in nearly every health care setting including clinics, hospitals, Veterans Affairs and Indian Health Care facilities, emergency rooms, urgent care sites, private physician or NP practices (both managed and owned by NPs), nursing homes, schools, colleges, retail clinics, public health departments, nurse managed clinics, homeless clinics, and home health. NPs hold prescriptive authority in all 50 states and the District of Columbia. It is important to note that 86.6% of NPs are certified in primary care, the majority of whom see Medicare and Medicaid patients. NPs complete more than one billion patient visits annually.

1. Specific Areas of Inquiry or Focus for the Workgroup

In this RFI, HHS requested comment on the development of a workgroup to increase innovation and investment in the health care sector. We support this concept, and recommend that outside parties, such as nurse practitioners and their patients, provide information regarding how they are impacted by HHS programs and regulations, as well as provide a forum for attendees to provide input on how these regulatory requirements can be improved. The workgroup should also examine ways to encourage private sector investment to help combat health crises.

One of the goals of this workgroup is to increase competition in the health care marketplace, and investment in the nurse practitioner workforce is essential to this concept. Nurse practitioners are the fastest growing provider group in the Medicare program and are trending to be the largest provider group

once 2017 Medicare data is released.¹ Nurse practitioners now comprise approximately 25% of the primary care workforce and should be included as participants in such workgroups.²

It should be noted that despite the importance of nurse practitioners in our health care system, barriers to practice still exist within the Medicare and Medicaid programs, and many investment opportunities and innovative care delivery models are focused only on physicians. This puts nurse practitioners at a disadvantage in being able to provide the high-quality, cost-effective health care that NPs have been proven to provide. It is important that this workgroup acknowledge the important role that nurse practitioners play in our health care system, examine the regulatory barriers to NP practice and involve nurse practitioners in all future innovations and investment opportunities.

2. Workgroup Structure

In this RFI, HHS requested feedback on the stakeholders that should be involved in this workgroup, but the RFI did not make any reference to health care providers. We believe that it is imperative that nurse practitioners, other health care providers and patient advocates are heavily involved in this workgroup. The innovation and investments recommended by the workgroup will ultimately be utilized by clinicians and their patients, and they must have a role in the development of these recommendations.

3. Increased Engagement and Dialogue with Health Care Industry

We agree with HHS that it is important to increase opportunities for dialogue with the health care industry related to investment and innovation. We stress the importance of including nurse practitioners and other health care providers in the work group and any other subgroups or committees developed as a part of this initiative. HHS may consider a structure similar to the Technical Expert Panels convened to provide input on MACRA. This would allow providers and other stakeholders to provide expert input on specific areas of interest identified by the workgroup.

We thank you for the opportunity to comment on this Request for Information. We look forward to working with HHS to increase innovation and investment in the health care sector. Should you have comments or questions, please direct them to MaryAnne Sapio, V.P. Federal Government Affairs, msapio@aanp.org, 703-740-2529.

Sincerely,



David Hebert
Chief Executive Officer

¹ https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/CMSProgramStatistics/2016/2016_Utilization.html.

² [Rural And Nonrural Primary Care Physician Practices Increasingly Rely On Nurse Practitioners](#), Hilary Barnes, Michael R. Richards, Matthew D. McHugh, and Grant Martsof, Health Affairs 2018 37:6, 908-914.