



American Association of
NURSE PRACTITIONERS™

Enable Nurse Practitioners (NPs) to Participate Fully as Members of Hospital Medical Staffs

ACTION NEEDED: Amend Medicare Conditions of Participation to Require Hospitals to Consider NPs for Appointment to Medical Staffs.

Current proposed Medicare regulations allow hospitals to consider nurse practitioners for appointment to medical staffs and granting of clinical privileges, but the rules fail to ensure that NPs will be evaluated and that the evaluation will be done objectively in a timely manner with clear explanations and a right to appeal a hospital's decision.

Background: The landmark Institute of Medicine 2010 report, "The Future of Nursing: Leading Change, Advancing Health," includes recommendations for Congress and the Department of Health and Human Services to remove barriers limiting the ability of nurse practitioners and other advanced practice nurses to practice to the full extent of their educational preparation. One of the key recommendations of the IOM report calls for revising the requirements for hospital participation in the Medicare program to ensure that nurse practitioners and other advanced practice registered nurses are eligible for clinical privileges (including admitting privileges) and membership on medical staff.

The Centers for Medicare and Medicaid Services has taken steps in recent regulations to improve opportunities for nurse practitioners to obtain clinical privileges and to be appointed to medical staffs. However, without a requirement that hospitals establish objective procedures for reviewing applications, concerns remain that hospitals and professionals who have an interest in controlling the procedures will continue to deny NPs full access and privileges as members of hospital medical staffs.

Legislation is needed to require hospitals to establish and implement uniform standards and procedures for consideration of applications from nurse practitioners and all eligible clinical providers for appointment to the hospital medical staff and for the granting of clinical privileges. Not later than 60 days after the date of the receipt of a complete application, a hospital should be required to make a decision and to notify the applicant of such decision in writing.

If a hospital decides to deny an application for appointment to the medical staff or to deny clinical privileges, that decision should include a full statement of the rationale, including specific information relied upon by the hospital in the decision. The applicant should be informed about rights to a hearing that allows a thorough review of the complete record of the hospital's decision with the right to be represented by legal counsel.

Request: The American Association of Nurse Practitioners (AANP) supports legislation to reform the Medicare statute and hospital conditions of participation to provide non-discriminatory guidance to hospitals on the process to be used in evaluating nurse practitioners for membership on hospital medical staffs and granting hospital clinical privileges. We believe uniform procedures for medical staffing and clinical privileging can benefit all health professionals and the patients they serve. These steps will reinforce the efforts by CMS and many hospitals to improve patient care by expanding the use of nurse practitioners to provide more timely and appropriate care, while ensuring a fair marketplace for NPs to practice to the full extent of their education and clinical preparation.