

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

December 20, 2019

Dear Secretary Azar,

On behalf of the undersigned organizations, we are writing to applaud section 5 of the President's recent Executive Order entitled *Protecting and Improving Medicare for our Nation's Seniors* (EO). We commend the Administration's efforts in section 5 of the EO to ensure that access to high-quality care is not hampered by outdated barriers to practice.

One of these barriers to practice falls under the home health care benefit in the Medicare and Medicaid programs. Under the current Medicare and Medicaid structure, nurse practitioners (NPs), physician assistants (PAs), certified nurse midwives (CNMs) and clinical nurse specialists (CNSs) must find a physician to document that a face-to-face assessment has taken place, and have the physician certify and recertify the plan of care. NPs, PAs, CNMs and CNSs that are the primary care providers for patients in the Home Health Care Program are not able to initiate or make necessary adjustments to medication or treatment without obtaining a physician signature. This delays access to treatment and puts patients at risk for avoidable complications that lead to increased emergency department (ED) visits and hospitalizations and increased health care costs. Delays in care are especially problematic for home health care patients who suffer from more chronic conditions and report more limitations on activities of daily living than the non-home health care Medicare beneficiary population.<sup>[1]</sup>

We believe that removing this barrier to care is directly aligned with Section 5 of the EO which calls for the removal of burdensome requirements that prevent clinicians from practicing to the top of their profession. We request that you act to ensure this barrier to practice is removed by promulgating regulations to ensure NPs, PAs, CNMs, and CNSs are authorized to document face-to-face assessments and certify/recertify plans of care for Medicare and Medicaid patients. We thank you for addressing this request and look forward to working with the Administration on improving access to medically necessary health care.

Sincerely,



Dr. Deborah Dunn, EdD, MSN, GNP-BC, ACNS-BC GS-C  
2019-2020 GAPNA President

The Gerontological Advanced Practice Nurses Association (GAPNA) is the premier organization that represents the interests of nurse practitioners and all providers who work with older adults. Since its founding in 1981, GAPNA's central mission is to advance excellence in the care of older adults. Our members are active in a variety of settings across the health care continuum including primary, acute, post-acute, home care, and long-term care. GAPNA provides opportunities for education, leadership, research, advocacy, networking, and advancement of evidence-based care for older adults.

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<sup>[1]</sup> [http://ahhqj.org/images/uploads/AHHQI\\_2018\\_Chartbook\\_09.21.2018.pdf](http://ahhqj.org/images/uploads/AHHQI_2018_Chartbook_09.21.2018.pdf).