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

September 14, 2020

Dear Administrator Verma,

On behalf of the Advanced Practitioner Society for Hematology and Oncology (APSHO), we acknowledge and very much appreciate your leadership as our communities cope with the challenges of the COVID-19 pandemic. Our organization represents advanced practitioners (APs) in oncology: nurse practitioners, physician assistants, clinical nurse specialists, advanced degree nurses, and pharmacists, many of whom are on the front lines treating patients infected with the COVID-19 virus.

We commend the Centers for Medicare & Medicaid Services’ (CMS) rapid response to the COVID-19 public health emergency that added options to maximize healthcare delivery efficiency and maintain patient access to high-quality medical care. We support the numerous temporary waivers and regulatory changes that authorize APs and other health professionals to practice to the full extent of their education, clinical competence, and experience to meet the needs of our patients.

The improved flexibility in the utilization of the healthcare workforce has been instrumental in sustaining adequate healthcare resources necessary to maintain access to care. If the goal of CMS is to improve long-term patient access to care, these regulatory flexibilities should be transitioned to formal policy, regardless of the COVID-19 public health emergency.

“Now more than ever, we need health care professionals working together.”

~American Medical Association

An efficient and effective healthcare workforce requires that outdated practice rules and regulations be modernized to authorize every health professional to deliver care at the top of their education, clinical training, and expertise. Efficient and accessible care delivery occurs when APs, physicians, and other healthcare professionals work together to provide quality care tailored to the needs of the patient without burdensome or restrictive administrative and regulatory constraints.

A surprising number of physician organizations want to restrict delivery of safe, high-quality healthcare by APs based on unsubstantiated claims that care quality will suffer if health professionals who are not physicians are authorized to deliver care to the top of their education.
and expertise. The facts simply do not support such assertions. In fact, objective reports across multiple medical specialties and primary care settings have come to the opposite conclusion (Bruinooge et al., 2018; Cairo et al., 2017; Hylton & Smith, 2017; Johnson et al., 2019; McCleery, Christensen, Peterson, Humphrey, & Helfand, 2011; Patiño et al., 2018; Shulman, Sheldon, & Benz, 2020; Walling et al., 2017; Yen, Laud, McGinley, Pezzin, & Nattinger, 2020). Turning back the clock and returning to a rigid mandate of physician-led teams does not serve our patients and communities. By definition, this will limit access to care.

We endorse building on the President's Executive Order #13890, *Protecting and Improving Medicare for our Nation's Seniors* and the Health and Human Services (HHS) report “Reforming America’s Health Care System Through Choice and Competition.” The HHS report specifically recommends:

1) “Extremely rigid collaborative practice agreements and other burdensome forms of physician and dentist supervision are generally not justified by legitimate health and safety concerns,”

and

2) “States should consider changes to their scope-of-practice statutes to allow all healthcare providers to practice to the top of their license, utilizing their full skill set.”

We appreciate your continued commitment to removing unnecessary practice barriers and expanding patient access to needed healthcare services. By promoting policies and regulations that maximize the education and skill sets of all health professionals, states, and communities are empowered to make informed decisions to improve access to quality healthcare tailored to their individual circumstances, available resources, and unique patient needs. Timely and appropriate patient access to quality care, patient satisfaction, and the effective use of resources should be the driving force in an efficient healthcare system. Efforts aimed at protecting professional turf only serve to hinder these aims. We strongly urge you to make permanent the waivers and regulatory changes put in place during the COVID-19 public health emergency.

Sincerely,

Sandra Kurtin, PhD, ANP-C, AOCN®
President, Advanced Practitioner Society for Hematology and Oncology (APSHO)

References