October 24, 2012

Marilyn Tavenner, MHA, RN
Acting Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
P.O. Box 8010
7500 Security Boulevard
Baltimore, MD 21244-8010

RE: Comments Pertaining to CMS' Preliminary Decisions on the Recommendations of the Hospital Outpatient Payment Panel on Levels for Select Services, September 24, 2012.

Dear Ms. Tavenner:

On behalf of the 46 undersigned organizations representing the Nursing Community, we submit the following comments concerning the Centers for Medicare and Medicaid Services’ (CMS) preliminary recommendations of the Hospital Outpatient Payment Panel on supervision for select services as requested on September 24, 2012.

The Nursing Community is a forum for national professional nursing associations to build consensus and advocate on a wide spectrum of healthcare and nursing issues. The Nursing Community is committed to improving the health and health care of our nation by collaborating to support the education, research, and practice of Registered Nurses (RNs) and Advanced Practice Registered Nurses (APRNs). Our organizations, representing America’s 3.1 million RNs and APRNs, commend CMS for recommending that the fifteen Healthcare Common Procedure Coding System (HCPCS) and Current Procedural Terminology (CPT) codes change from direct to general supervision. As one additional step in the process of improving health care by expanding access and reducing cost while ensuring quality, this decision further recognizes the ability of RNs to provide these services without the supervision of a physician or other eligible providers such as nurse practitioners. This reinforces the clear message outlined in the Institute of Medicine’s report the Future of the Nursing: Leading Change, Advancing Health that states “Nurses should practice to the full extent of their education and training.” While more must continue to be done, this change supports the role nursing providers play in increasing access to timely, effective, efficient, and quality healthcare.

We appreciate the opportunity to comment. Should you have any questions regarding these matters, please feel free to contact Suzanne Miyamoto at smiyamoto@aacn.nche.edu.

Sincerely,

Academy of Medical-Surgical Nurses
American Academy of Ambulatory Care Nursing
American Academy of Nurse Practitioners
American Academy of Nursing
American Assembly for Men in Nursing
American Association of Colleges of Nursing
American Association of Critical-Care Nurses
American Association of Nurse Anesthetists
American College of Nurse Practitioners
American College of Nurse-Midwives
American Nephrology Nurses' Association
American Nurses Association
American Organization of Nurse Executives
American Pediatric Surgical Nurses Association
American Psychiatric Nurses Association
American Society for Pain Management Nursing
American Society of PeriAnesthesia Nurses
Association of Nurses in AIDS Care
Association of periOperative Registered Nurses
Association of Public Health Nurses
Association of Rehabilitation Nurses
Association of Women's Health, Obstetric and Neonatal Nurses
Dermatology Nurses' Association
Gerontological Advanced Practice Nurses Association
Hospice and Palliative Nurses Association
Infusion Nurses Society
International Association of Forensic Nurses
International Nurses Society on Addictions
International Society of Psychiatric Nursing
National American Arab Nurses Association
National Association of Clinical Nurse Specialists
National Association of Neonatal Nurse Practitioners
National Association of Neonatal Nurses
National Association of Nurse Practitioners in Women's Health
National Association of Pediatric Nurse Practitioners
National Association of School Nurses
National Black Nurses Association
National Organization for Associate Degree Nursing
Nurses Organization of Veterans Affairs
Oncology Nursing Society
Pediatric Endocrinology Nursing Society
Preventive Cardiovascular Nurses Association
Public Health Nursing Section, American Public Health Association
Society of Urologic Nurses and Associates
Visiting Nurse Associations of America
Wound, Ostomy and Continence Nurses Society