

November 20, 2015

Submitted via paymentnetwork@MITRE.org

APM Framework and Progress Tracking Work Group

RE: Alternative Payment Model Framework Draft White Paper Version Date 10/22/2015

To Whom It May Concern:

On behalf of the undersigned organizations, we are pleased to provide comments on this draft white paper on the Alternative Payment Model Framework.

Advance Practice Registered Nurses (APRNs) include Certified Nurse-Midwives (CNMs), Certified Registered Nurse Anesthetists (CRNAs), Nurse Practitioners (NPs), and Clinical Nurse Specialists (CNSs). APRNs play a significant role in ensuring patient access to high quality healthcare that is cost-effective. We thank the Health Care Payment Learning & Action Network (LAN) for the opportunity to comment on this draft white paper.

Framework Should Note and Address Barriers to the Use of APRNs

While we support the seven principles listed in the framework, we request that the framework highlight the barriers to the use of APRNs and include ways to address these barriers. We note that the bulk of the principles of the framework relate to access to providers, placing a premium on patient access to APRNs. The need for access to APRN services is crucial, and APRNs are the solution to developing improvements to quality, access, and cost-efficiency in healthcare. However, the framework does include the significant barriers to the use of APRNs. These barriers include burdensome physician supervision requirements, not credentialing APRNs in health plans, which results in APRNs being excluded from health plan networks, and not reimbursing for services that are within an APRN's state scope of practice. Waiving such burdensome barriers to the use of APRNs will enhance access to care, ensure quality healthcare delivery, and contribute to cost savings. This idea also corresponds with a recommendation from

the Institute of Medicine's report titled *The Future of Nursing: Leading Change, Advancing Health*, which outlines several paths by which patient access to care may be expanded, quality preserved or improved, and costs controlled through greater use of APRNs.¹ The IOM report specifically recommends that, "advanced practice registered nurses should be able to practice to the full extent of their education and training."² Noting and addressing the barriers to the use of APRNs in the framework will ensure that these principles are meaningful.

We thank you for the opportunity to comment on this draft white paper. Should you have any questions regarding these matters, please feel free to contact the AANA Senior Director of Federal Government Affairs, Frank Purcell, at 202.484.8400, fpurcell@aanadc.com.

Sincerely,

American Academy of Nursing, AAN
American Association of Colleges of Nursing, AACN
American Association of Nurse Anesthetists, AANA
American Association of Nurse Practitioners, AANP
American College of Nurse-Midwives, ACNM
American Nurses Association, ANA
National Association of Clinical Nurse Specialists, NACNS
National Association of Nurse Practitioners in Women's Health, NPWH
National Association of Pediatric Nurse Practitioners, NAPNAP

¹ IOM (Institute of Medicine). *The Future of Nursing: Leading Change, Advancing Health* (Washington, DC: The National Academies Press, 2011), 69.

² IOM op. cit. p. 7-8.