



NATIONAL ASSOCIATION OF  
CLINICAL NURSE SPECIALISTS

March 2, 2015

The Honorable Sylvia Matthews Burwell  
Secretary  
Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

The Honorable Jack Lew  
Secretary  
Department of Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

The Honorable Tom Perez  
Secretary  
Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20201

**Re: Summary of Benefits and Coverage and Uniform Glossary [CMS-9938-P]**

Dear Secretaries Burwell, Lew and Perez:

The National Association of Clinical Nurse Specialists (NACNS), representing more than 72,000 clinical nurse specialists, appreciates the opportunity to comment on the proposed rulemaking, *Summary of Benefits and Coverage (SBC) and Uniform Glossary* (79 FR 78577). Specifically, *NACNS recommends that the Departments revise the mandatory list of terms contained in the proposed rulemaking (1) to include a definition of advanced practice registered nurses (APRNs) and (2) to include a mandatory definition for “physician/practitioner services” rather than “physician services.”*

**Include a Definition of APRNs**

As proposed, the rule mandates definitions of both “primary care physician” and “primary care provider.” The definition of “primary care provider,” contained in the proposed updates to the *Glossary of Health Coverage and Medical Terms*, references two APRN roles – nurse practitioner and clinical nurse specialist – in addition to physicians. However, a separate definition for *Primary Care Physician* also is included in the current glossary. Since APRNs also fulfill this role, it is important that the regulations also mandate – and the glossary include – a definition of the APRN role. An example of such a definition for your consideration is:

APRNs are clinicians with advanced training who provide primary, acute, and specialty healthcare services. APRNs complete a master’s, postmasters or doctoral degree program including clinical training beyond their registered nurse preparation. The four APRN roles are Nurse Practitioners (NPs), Certified Registered Nurse Anesthetists (CRNAs), Certified Nurse-Midwives (CNMs) and Clinical Nurse Specialists (CNSs).

APRNs providing primary care services are not new. They have delivered professional health services to patients for decades. It is well documented that APRNs deliver the same, high quality care as that of primary care physicians. In addition to the direct provision of health care, APRNs play an integral role in managing and coordinating care for patients, particularly those with chronic disease, multiple co-morbid conditions, and other complexities. As the shortage of physicians grows – at the same time as an estimated 10,000 people a day turn 65 and the number of newly insured Americans increases – APRNs are well positioned to help address the growing demand for high quality healthcare services.

**Include a Definition for Physician/Practitioner Services**

The proposal requires that a definition of “physician services” be included in the glossary. That definition currently states that physician services are “*Health care services a licensed medical physician, including an M.D. (Medical Doctor) or D.O. (Doctor of Osteopathic Medicine), provides or coordinates.*” As delineated above, APRNs also provide a wide range of health care services to patients. Despite the historical use of physician services to encompass services provided by non-physician practitioners, such as APRNs, the current definition in the proposed glossary does not mention the role of APRNs at all.

NACNS joins with the American Nurses Association in recommending that you revise the proposed rule to include a mandatory definition for “physician/practitioner services” (rather than “physician services”) and that this definition specifically refer to the health care services provided by APRNs and other providers legally authorized to practice within their States.

Thank you for the opportunity to provide these comments and for your careful consideration of them. If you have questions about our comments or require additional information, please feel free to contact Melinda Mercer Ray, NACNS Executive Director, at 703-929-8995.

Sincerely yours,

A handwritten signature in black ink that reads "Leslie K. Rodriguez". The signature is written in a cursive, flowing style.

Les Rodriguez, MSN, MPH, RN, ACNS-BC  
President