



November 7, 2017

The Honorable Michael Burgess
Chairman
Committee on Energy and Commerce
Subcommittee on Health
2336 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Gene Green
Ranking Member
Committee on Energy and Commerce
Subcommittee on Health
2470 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman and Ranking Member:

The American Association of Nurse Practitioners (AANP), representing more than 234,000 nurse practitioners (NPs) in the United States, would like to offer the following information for the record regarding the *MACRA and Alternative Payment Models: Developing Options for Value-Based Care* hearing the Subcommittee is holding on Wednesday, November 8, 2017.

NPs are advanced practice registered nurses who are prepared at the masters or doctoral level to provide primary, acute, chronic and specialty care to patients of all ages and walks of life. Daily practice includes: assessment; ordering, performing, supervising and interpreting diagnostic and laboratory tests; making diagnoses; initiating and managing treatment including prescribing medication and non-pharmacologic treatments; coordinating care; counseling; and educating patients and their families and communities. NPs practice in nearly every health care setting including clinics, hospitals, Veterans Affairs and Indian Health Care facilities, emergency rooms, urgent care sites, private physician or NP practices (both managed and owned by NPs), nursing homes, schools, colleges, retail clinics, public health departments, nurse managed clinics, homeless clinics, and home health. NPs hold prescriptive authority in all 50 states and the District of Columbia. It is important to note that 89.2% of NPs are certified in primary care, the majority of whom see Medicare and Medicaid patients. NPs complete more than one billion patient visits annually.

As the Committee continues to explore the implementation of MACRA and alternative payment models (APMs), we urge you to include the perspective of nurse practitioners in these discussions. As you know NPs have long been Medicare Part B providers, are recognized ACO providers, and were included as providers in the MACRA legislation previously passed by this committee. They are recognized in the final rule as eligible clinicians under the Merit-based Incentive Payment System and as participants in APMs, with one exception, as discussed below. We understand that this transition is an ongoing process, however, as this significant change from volume to value-based care continues, it is essential that all providers be included in the development of patient payment models so that all patients receive high quality healthcare from the Medicare provider of their choice.

Of particular interest to NPs is full participation in the Medicare Shared Savings ACO Program. Under current law, NPs can join the Shared Savings ACO, but their patients only count toward the shared savings if they see a physician for one visit a year. While this restriction does not prevent individual nurse practitioners from joining the ACO, it does prevent their patients from being assigned to the Medicare Shared Saving ACO and attainment of any benefits that result from such participation. We urge the Committee to examine H.R. 1160, the *ACO Assignment Improvement Act of 2017*, to allow the assignment of NP patients under the Medicare Shared Savings Program. As the transition to value-based care moves forward and more nurse practitioners provide primary care services to Medicare patients, this burden will continue to act as a barrier to patient and NP participation in Shared Savings ACOs.

As we have previously stated, AANP would like to serve as a resource and participate in these discussions, including those with the Physician Technical Advisory Committee (PTAC), as the Committee continues its examination of these important issues. We are actively engaging with our membership to solicit feedback on new payment models, which will be helpful as this process moves forward. Please contact the MaryAnne Sapio, V.P. Federal Government Affairs, governmentaffairs@aanp.org, 703-740-2529 should you or your staff require any additional information.

Sincerely,

A handwritten signature in black ink that reads "David E. Hebert". The signature is written in a cursive style with a long horizontal line extending to the right.

David Hebert
Chief Executive Officer