

May 20, 2021

William N. Parham, III
Centers for Medicare and Medicaid Services
Director, Paperwork Reduction Staff
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: CMS-10102: National Implementation of Hospital Consumer Assessment of Healthcare Providers and Systems (HCAHPS)

Dear Mr. Parham,

The American Association of Nurse Practitioners (AANP), representing more than 325,000 nurse practitioners (NPs) in the United States, appreciates the opportunity to comment on ways to enhance the quality, utility and clarity of CMS 10102, National Implementation of Hospital Consumer Assessment of Healthcare Providers and Systems (HCAHPS).

NPs are advanced practice registered nurses (APRNs) 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 the majority of NPs are certified in primary care and see Medicare and Medicaid patients. NPs complete more than one billion patient visits annually.

The HCAHPS survey is an important tool that assesses the hospital experience of patients. Our members who work within hospitals have noted the emphasis that facilities place on reviewing and assessing HCAHPS results but have expressed concern that the survey does not adequately include nurse practitioners.

We request that HHS begin the survey by listing out each provider type (physicians, nurse practitioners, physician assistants) and then change the “Your Care from Doctors” section to read “Your Care from Providers” using provider-neutral language throughout. While the survey does have a section titled “Your Care from Nurses” there is no mention of advanced practice nurses, including nurse practitioners. Nurse practitioners are often the main health care provider for a patient during the entirety of the stay, performing the same functions as an attending physician. This needs to be reflected in the HCAHPS survey so that hospitals and patients can better understand the role that nurse practitioners, and other providers, play in care delivery.

We thank you for the opportunity to comment on the HCAHPS survey. Should you have comments or questions, please direct them to MaryAnne Sapiro, V.P. Federal Government Affairs, msapiro@aanp.org, 703-740-2529.

Sincerely,



Jon Fanning, MS, CAE, CNED
Chief Executive Officer
American Association of Nurse Practitioners