

June 21, 2021

William N. Parham, III, Director
Centers for Medicare and Medicaid Services (CMS)
Office of Strategic Operations and Regulatory Affairs
7500 Security Boulevard
Baltimore, MD 21244-1850

RE: OMB Control Number: 0938-1240, National Implementation of the Outpatient and Ambulatory Surgery Consumer Assessment of Healthcare Providers and Systems (OAS CAHPS) Survey

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 the National Implementation of the Outpatient and Ambulatory Surgery Consumer Assessment of Healthcare Providers and Systems (OAS CAHPS) Survey.

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 backgrounds. 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 Health Administration and Indian Health Services facilities, emergency rooms, urgent care sites, private physician or NP practices (both managed and owned by NPs), skilled nursing facilities and nursing facilities, schools, colleges, universities, 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 and complete more than one billion patient visits annually.

The OAS CAHPS survey is an important tool that assesses the hospital outpatient departments and ambulatory surgical center (ASC) experience of patients. NPs are essential health care providers within hospital outpatient departments and ASCs. However, the survey does not adequately include NPs. We request that HHS begin the survey by listing each clinician type (e.g. nurse practitioners, physicians) and update the questions which refer to “your doctor” to read “your health care practitioner” using provider-neutral language throughout. While the survey does have questions referring to “nurses” there is no mention of advanced practice nurses, including nurse practitioners. NPs are often the main care provider for a patient, performing the same functions as an attending physician. This needs to be reflected in the OAS CAHPS survey so that hospital outpatient departments, ASCs, and patients can better understand and accurately report the provider data that should be attributed to NPs, and other clinicians, in care delivery.

We thank you for the opportunity to comment on the OAS CAHPS survey. We continue to strongly encourage CMS to standardize the practice of including nurse practitioners in all survey instruments. Should you have comments or questions, please direct them to MaryAnne Sapio, V.P. Federal Government Affairs, msapio@aanp.org, 703-740-2529.

Sincerely,



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Chief Executive Officer
American Association of Nurse Practitioners