

July 1, 2019

Gopal Khanna
Director
Agency for Healthcare Research and Quality (AHRQ)
U.S. Department of Health and Human Services (HHS)
1600 Research Boulevard; RB 1186S
Rockville, MD 20850

Re: Medical Expenditure Panel Survey (MEPS) Household Component- Notice

Dear Mr. Khanna,

The American Association of Nurse Practitioners (AANP), representing more than 270,000 nurse practitioners (NPs) in the United States, appreciates the opportunity to comment on this notice for additions to the MEPS Household Component. We look forward to continuing to work with AHRQ to improve the accuracy of surveys and the resulting data and research.

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.

Proposed Addition: Mental Health Self-Administered Questionnaire (SAQ)

We agree with AHRQ that a new survey targeting the adult population and focusing on issues related to an individual's mental health is an important addition to the MEPS Household Component family of surveys. As this survey is being developed, we request that AHRQ use provider neutral language throughout to ensure that care delivered by nurse practitioners and other providers is captured in the survey. We encourage AHRQ to use the same format as the Diabetes Care Survey, which begins by stating that "a health professional could be a general doctor, a specialist doctor, a nurse practitioner, a physician assistant, a nurse, or anyone else you would see for health care" and then includes "health professional" in each of the survey questions.

According to our most recent survey, there were approximately 11,000 NPs with a top clinical focus area in psychiatric and mental health care in 2018. Additionally, anxiety and depression were two of the top ten most treated conditions for NPs across all clinical settings. Research has shown that the number of

psychiatric-mental health NPs is steadily increasing, contrasted to a declining number of psychiatrists. Care delivered by psychiatric-mental health NPs is found to be high-quality, leads to positive behavioral outcomes and is comparable to that of their psychiatrist colleagues.¹ Including NPs in this survey is important to accurately evaluating all aspects of mental health care, including issues related to access, barriers to care and patient experience. Including NPs in this survey will give AHRQ a better understanding of the entire mental health care workforce.

Nurse practitioners provide a significant portion of mental health care to patients across all settings. To improve the accuracy of the survey data it is important that NPs are included in the survey instrument. We strongly encourage AHRQ to include nurse practitioners in the Mental Health SAQ and standardize the practice of including nurse practitioners in all survey instruments.

We thank you for the opportunity to comment on the MEPS Household Component, specifically the proposed addition of the Mental Health SAQ. Should you have comments or questions, please direct them to MaryAnne Sapio, V.P. Federal Government Affairs, msapio@aanp.org, 703-740-2529.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Hebert", with a long horizontal flourish extending to the right.

David Hebert
Chief Executive Officer

¹ <https://www.sciencedirect.com/science/article/pii/S0749379718316039>.