September 27, 2019

Seema Verma, MPH
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

Re: Medicare Program; CY 2020 Revisions to Payment Policies under the Physician Fee Schedule and Other Changes to Part B Payment Policies [CMS-1715-P]

Dear Administrator Verma:

On behalf of the National Coalition for Hospice and Palliative Care, thank you for the opportunity to support comments from our Coalition Members on the proposed rule to update payment rates for physicians and other qualified providers and to modify other Part B policies for calendar year (CY) 2020 that was recently issued by the Centers for Medicare and Medicaid Services (CMS). The Coalition represents the ten leading professional organizations dedicated to advancing the delivery of high-quality hospice and palliative care to all who need it. The national organizations that form the Coalition represent more than 5,200 physicians, 1,000 physician assistants, 11,000 nurses, 5,000 chaplains, 8,000 social workers, researchers, and pharmacists, along with over 1,800 palliative care programs and 5,300 hospice programs and their related personnel, caring for millions of patients and families each year across the United States. As such, we bring a broad, multidisciplinary perspective on this proposed rule and its impacts on the vulnerable patients that our members serve.

The Coalition would like to thank CMS for its many proposals that:

- More appropriately value and reimburse the time and resources required to provide care to patients with complex needs, including CMS’s proposals for evaluation and management (E/M visits) and care management services.
- We also appreciate CMS’s proposals to reduce documentation burden and better leverage the skills and capabilities of non-physician practitioners (Advanced Practice Providers such as physician assistants and nurse practitioners), who are critical members of the interdisciplinary hospice and palliative care teams that are a cornerstone of this person-centered care.

Role of Advance Practice Providers (APP’s-Physician Assistants and Nurse Practitioners in Hospice)

The Coalition supports proposals in the proposed rule that would allow PAs and all Advanced Practice Providers (including Nurse Practitioners) to practice to the full extent of their license consistent with state law. PAs serve as critical members of interdisciplinary care teams that provide palliative care services in both hospice and non-hospice settings.
The availability of PAs on these teams allows for greater and more timely access to high-quality hospice and palliative care, and the need for PAs to practice at the top of their license in close collaboration with physicians will only become more important to ensuring access in the face of a growing workforce shortage of palliative care clinicians.¹

- The *Clinical Practice Guidelines for Quality Palliative Care, 4th edition*², 2018 clearly defines recommendations for the interdisciplinary team to include APPs: “a team of physicians, advanced practice registered nurses, physician assistants, nurses, social workers, chaplains, and others based on need”. Each of these disciplines, including PAs, should be allowed to practice to the top of their licenses.

The Coalition supports CMS action to allow PAs to fulfill their patient responsibilities as attending physicians, including by amending the hospice conditions of participation (COPs) in order to specify that PAs may prescribe medication to Medicare hospice patients, regardless of whether the PA has an employment or contractual relationship with the hospice.

The Coalition strongly encourages CMS to expand the role of all APPs by allowing them to admit patients to hospice, as well as certify and recertify patients for hospice care and to practice at the top of their license to the extent allowed by state scope of practice requirements.

Our Coalition Members have had the opportunity to discuss the proposed rule and the impact these proposals would have on the patients and families that are served by hospice and palliative care providers. The Coalition supports the detailed comments as submitted by our Member organizations below and encourages CMS to view these comments in greater detail and consider the level of interdisciplinary consensus they provide:

**American Academy of Hospice and Palliative Medicine (AAHPM)**
**Hospice and Palliative Nurses Association (HPNA)**
**National Hospice and Palliative Care Organization (NHPCO)**
**Physician Assistants in Hospice and Palliative Medicine (PAHPM)**

Thank you for the opportunity to support the comments of our Coalition Members. If you and/or members of your staff are interested in speaking with Coalition leadership, please contact Amy Melnick, Executive Director, [amym@nationalcoalitionhpc.org](mailto:amym@nationalcoalitionhpc.org) or 202.306.3590.

Sincerely,

Amy Melnick, MPA

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