



Allow Nurse Practitioners & Other Health Professionals to Order/Certify Medicare Home Health Services

Background: Nurse practitioners (NPs), Physician Assistants (PAs), Clinical Nurse Specialists (CNS) and other advance practice health professionals are playing an increasing role in the delivery of health care but are not allowed to order/certify home health services or document the required Medicare face-to-face encounter with patients.

These advance practice health professionals are an integral component of the health care system. Many state laws and regulations, including New York's, authorize these non-physician health professionals to complete and sign home health plans of care, physical examination forms and other types of medical certification documents. The Institute of Medicine has released a study which recommends that NPs and clinical nurse specialists be allowed to certify eligibility for Medicare home health services as well – a task they are not permitted to perform.

Legislative Actions: The federal government is also recognizing the growing role of PAs and NPs. The Balanced Budget Act of 1997 allows Medicare to reimburse PAs and NPs for providing services that would normally be provided by physicians to Medicare patients. These physician services include surgery, consultation, and home and institutional visits. NPs can order physical, occupational and speech therapies, and order and bill for performing and interpreting diagnostic tests within their scope of practice. The Affordable Care Act allows NPs to perform the face-to-face encounter for patients, though they must report the clinical findings to a physician who provides the final certification. NPs and PAs can also certify and recertify Medicare patient eligibility for skilled nursing facility services. In addition, the U.S. Centers for Medicare and Medicaid Services (CMS) allows PAs and NPs to sign certificates of medical necessity required for home medical equipment claims under Medicare.

Congress has introduced legislation permitting NPs, PAs and other specified advance practice health professionals to certify Medicare home health plans of care and to document the Medicare face-to-face encounter. HCA strongly supports this legislation (S.578/H.R.1342), called the "Home Health Care Planning Improvement Act," which was introduced by Senator Collins (R-ME) and Representative Walden (R-Oregon) and co-sponsored by Senator Schumer (D-NY).

HCA Recommendation: HCA urges the New York Congressional Delegation to cosponsor the "Home Health Care Planning Improvement Act" and press for full Congressional action on this bipartisan measure. Currently, NPs and other advanced practice health professionals work closely with physicians to ensure that patients receive necessary care for many Medicare-covered services. They are increasingly providing services to Medicare beneficiaries in rural and underserved areas. In particular, they serve a vital need in communities where physician shortages exist, as they are sometimes more available than physicians to expedite the required paperwork to ensure that care to beneficiaries will be initiated and continued.