

United States Senate

WASHINGTON, DC 20510

June 11, 2019

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
200 Independence Avenue, S.W.
Washington, DC 20201

Dear Administrator Verma,

We appreciate the focus the Centers for Medicare and Medicaid Services (CMS) is placing on lowering the administrative burden placed on health care providers. As leaders of the Senate Rural Health Caucus, this work is especially important to improve the practice environment in rural communities, which face chronic shortages of health care providers.

Given our shared goal of reducing administrative burdens, we take this opportunity to highlight a specific change in the Medicare Claims Process Manual, which while well intentioned, fails to address the full range of students training for careers in health care. Specifically, in Transmittal 4068 (replacing Transmittal 3971), CMS permitted a teaching physician to use notes written by a medical student.

Prior to this change, a teaching physician had to write a separate note, even if the teaching physician agreed with the documentation created by the medical student. We agree allowing the teaching physician to verify and utilize a note prepared by a medical student is appropriate.


However, we are concerned applying this standard only to medical students ignores both physician assistant and advanced practice nursing students. In particular, this policy harms interprofessional education. We believe training the next generation of clinicians requires a team based approach. Creating different standards for different types of students creates an unnecessary barrier to this goal.

In addition, both physician assistants and advanced practice nurses are heavily involved in the training of students. Known as preceptors, these individuals serve a similar function in clinical settings as teaching physicians. By failing to allow these professionals to document in the same manner as teaching physicians, CMS is placing a higher administrative burden on APRNs and PAs, compared to their physician colleagues.

Looking forward, CMS should revise its policy regarding student documentation so all professionals are treated equally. Specifically, we support allowing all teaching clinicians, including physicians and advanced practice clinicians, to utilize the notes of students. This will reduce the administrative burden on teaching clinicians and support our shared goal of greater interprofessional education.

Thank you in advance for your consideration of this request.

Sincerely,


John Barrasso
United States Senator


Tina Smith
United States Senator