



Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Washington, DC

Dear Administrator Verma:

The Coalition for Patients' Rights (CPR), which consists of 16 healthcare professional organizations representing non-MD/DO (medical doctor/doctor of osteopathy) providers, is writing in response to the CMS request for input and recommendations on policy changes that could eliminate practice restrictions which limit many providers from practicing to the full scope of their education, training, certification and licensure.

The scope of practice restrictions which the agency seeks to identify and correct hamper the ability of many highly qualified healthcare professionals to deliver effective, cost-efficient patient care. These valuable healthcare resources can and should be used in a much more productive way, especially at a time when the healthcare system is stretched to the breaking point. Further, patients would benefit greatly by not being limited in their choice of healthcare providers and, for patients living in rural and other medically underserved areas of the country, not having to travel long distances for essential care.

Therefore, CPR urges the agency to take the following actions:

- Revise regulations that restrict healthcare professionals to such a degree that they are prevented from practicing to the full extent of their education, training, certification and licensure.
- Give full consideration to comments submitted by the individual member organizations of CPR.

The Coalition looks forward to CMS implementing change that will allow the providers we represent to practice to the full extent of their education, training, licensure and certification for the good of the patients we serve. Enabling all providers to practice to the top of their license would increase patient access to care, streamline the healthcare system, and make more efficient use of human and financial healthcare resources.

Thank you for the opportunity to comment.

Sincerely,

Coalition for Patients' Rights:
American Association for Marriage and Family Therapy
American Association of Nurse Anesthetists
American College of Foot and Ankle Surgeons
Association of periOperative Registered Nurses
American Occupational Therapy Association
American Psychological Association
American Physical Therapy Association
Board for Certification of Nutrition Specialists
National Alliance of State Pharmacy Associations
National Association of Nurse Practitioners in Women's Health