



Pennsylvania  
MEDICAL SOCIETY®

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January 16, 2020

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The Honorable Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services  
Hubert H. Humphrey Building  
200 Independence Avenue, SW  
Washington, DC 20201

Re: Scope of Practice

Dear Administrator Verma:

The Pennsylvania Medical Society (PAMED) represents thousands of physicians who treat Pennsylvania's Medicare patients every day. We are committed to working with your administration to improve the program, particularly with efforts to reduce administrative burden. As such, we are writing to provide input on your request dated December 26, 2019.

PAMED is a firm believer of physician-led health care teams and supports the value of the strengths of all team members. Working collaboratively health care team members excel in their areas of expertise, leading to the best patient outcomes. As the most highly educated and trained health care professional, physicians must lead the health care team. There is a vast difference in the education and training of physicians and other health care professionals, including nurse practitioners and physician assistants.

While nurse practitioners and physician assistants do good work within the health care team model and are greatly appreciated by many patients, polls recently conducted in Pennsylvania show the vast majority of patients still want physicians involved in their care. Of the 3,300 Pennsylvanians who participated in the survey, 90 percent cited physicians as the most trusted health care professional to deal with chronic illnesses; 73 percent said physicians and nurse practitioners should continue to work together through collaborative agreements.

777 East Park Drive  
PO Box 8820  
Harrisburg, PA 17105-8820

**Membership Inquiries**  
855-PAMED4U  
(855-726-3348)

Tel: (717) 558-7750  
Fax: (717) 558-7840  
Email: [KnowledgeCenter@pamedsociety.org](mailto:KnowledgeCenter@pamedsociety.org)

The results were similar in both urban and rural settings. For example:

- 90 percent of participants in Potter County, one of Pennsylvania's smallest and most rural counties, said they trusted physicians more than NPs and PAs to treat chronic illness.
- 86 percent of participants in Allegheny County, home to Pittsburgh and the state's second largest population base, said they also trusted physicians the most to treat chronic illness.

While most states require physician supervision and/or collaboration of mid-level providers, lawmakers in several of those states, including Pennsylvania, continue to push to remove those requirements. Having CMS support for uniform supervision and collaboration across the country would be a tremendous asset to states fighting those challenges.

PAMED is also concerned with the language that would require the Secretary of the Department of Health and Human Services to propose a regulation that would affect the reimbursement of physicians and nonphysicians established under the Social Security Act. Reimbursing healthcare professionals by time spent with a patient and not occupation will have significant impacts. Of equal concern is removing the counted elements of an office visit, and instead focusing on time and/or medical complexity. Physicians with the additional education, training and experience, should be reimbursed appropriately for care they provide, especially for the medically complex patient, and certainly not at the same levels of nurse practitioners and physician assistants. As we age, the complexity of illness requires health care professionals who possess the clinical acumen to appropriately and effectively treat patients who often present multiple and complex conditions. Physicians are the most capable professionals to meet the needs of patients with complex conditions. With the U.S. Census Bureau projecting that one out of five Americans will be over the age of 65 by 2030, Medicare will play an even larger role in health care delivery. Medicare patients are some of the most medically vulnerable patients in our population, often suffering from multiple chronic conditions or other complex medical needs. As such they deserve care led by physicians - the most highly educated, trained and skilled health care professionals. We cannot and should not allow anything less. Reimbursing physicians at the same rate as nurse practitioners and physician assistants, will result in hospitals and health systems replacing physicians with mid-level provider who can be paid less. Where does that leave these medically vulnerable patients?

While all health care professionals play a critical role in providing care to patients, their skillsets are not interchangeable with that of a fully trained physician. The scope of practice and reimbursement of health care professionals should be commensurate with their level of education and training, not based on anything else. Patients – and in this case Medicare patients – deserve nothing less.

Sincerely,

A handwritten signature in cursive script that reads "Lawrence R. John, M.D.".

Lawrence R. John, MD  
President