



PHYSICIAN ASSISTANT EDUCATION ASSOCIATION
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September 26, 2019

Seema Verma, MPH
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1715-P
P.O. Box 8016
Baltimore, MD 21244-8016

[Filed electronically at <http://www.regulations.gov>]

RE: Medicare Program; CY 2020 Revisions to Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment Policies; Medicare Shared Savings Program Requirements; Medicaid Promoting Interoperability Program Requirements for Eligible Professionals; Establishment of an Ambulance Data Collection System; Updates to the Quality Payment Program; Medicare Enrollment of Opioid Treatment Programs and Enhancements to Provider Enrollment Regulations Concerning Improper Prescribing and Patient Harm; and Amendments to Physician Self-Referral Law Advisory Opinion Regulations (CMS-1715-P)

Dear Administrator Verma:

On behalf of the Physician Assistant Education Association (PAEA), we are writing to offer our comments on CMS-1715-P, the Physician Fee Schedule proposed rule for calendar year 2020. PAEA represents all 246 accredited PA education programs operating in the United States. As CMS works to eliminate burdensome administrative requirements that do not contribute meaningfully to patient care, PAEA welcomes ongoing opportunities to offer comments on the most pressing concerns of PA educators seeking to prepare a high-quality workforce for Medicare beneficiaries. To this end, we would like to offer the following suggestions:

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Student Documentation of Evaluation and Management (E/M) Services

Throughout prior communications with CMS, PAEA has emphasized the adverse impact that current restrictions on preceptor use of student-provided medical record documentation have had on the willingness of clinicians to train students. While Transmittal 3971, and, subsequently, Transmittal 4068, was intended to be a step forward by allowing teaching physicians to verify, rather than re-perform, documentation provided by students, the inability of PA and advanced practice registered nurse (APRN) preceptors to similarly verify PA/APRN student documentation limited the impact of this change. Rather than eliminating administrative barriers, this change instead compelled health systems and practices to reexamine their policies regarding training PA/APRN students due to the increased administrative burden associated with precepting these students.

PAEA strongly supports CMS' proposal to address the disparity by allowing all preceptors to verify, rather than re-perform, documentation provided by medical, PA, and APRN students. However, while the agency's intention to correct the disparity is clear, we would urge CMS to use more explicit terminology in the final Physician Fee Schedule rule to eliminate any future confusion among key stakeholders. Specifically, §§ 410.20 (Physicians' services), 410.74 (PA services), 410.75 (NP services), 410.76 (CNS services), and 410.77 (CNM services) should explicitly include physician assistants and advanced practice registered nurses rather than including these providers as eligible "other members of the medical team." Similarly, due to the current ambiguous definition of "student," these sections should specifically state that all preceptors can utilize the verified documentation of **medical, PA, and APRN students** rather than students generally.

In addition to explicit language regarding PA/NP preceptors and students, we would also urge CMS to address burdensome "physical presence" restrictions that similarly serve as a barrier to student training without meaningfully contributing to the quality of patient care. PAEA would like to express our concurrence with the revised scenarios offered in the comments of the Council of Academic Family Medicine. We would, however, urge CMS to institute the same requirements for PA/APRN preceptors/billing clinicians as teaching physicians and to amend §§ 410.20 (Physicians' services), 410.74 (PA services), 410.75 (NP services), 410.76 (CNS services), and 410.77 (CNM services) accordingly.

If you have any questions about our comments or require additional information, please contact Chief Policy & Research Officer Dave Keahey at dkeahey@PAEAonline.org or at (703) 667-4339.

Sincerely,



A handwritten signature in black ink that reads 'Jonathan Bowser'.

Jonathan Bowser, MS, PA-C
President

A handwritten signature in black ink that reads 'Sara G. Fletcher'.

Sara Fletcher, PhD
Interim Chief Executive Officer