



PHYSICIAN ASSISTANT EDUCATION ASSOCIATION

655 K Street NW, Ste. 700, Washington, DC 20001
PAEAonline.org • 703-548-5538

January 17, 2020

Seema Verma, MPH
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

RE: Patients Over Paperwork Request for Feedback on Scope of Practice

Dear Administrator Verma:

On behalf of the Physician Assistant Education Association (PAEA), the national organization representing all 250 accredited PA programs operating in the United States, we are writing in response to CMS' recent request for feedback on Medicare regulations that inhibit health professionals from practicing at the top of their license. PAEA welcomes the Administration's interest in fully utilizing the capacity of the advanced practice provider workforce and would like to offer the following comments in response to this request.

In order to ensure timely access to care for beneficiaries, it is critical that the Administration supports the elimination of practice barriers that do not positively contribute to the quality of patient care. As such, PAEA would like to express our concurrence with the comments offered by the American Academy of PAs.

We urge the agency and the Administration to support policy changes that would authorize PAs to:

- Receive direct payment under Medicare
- Order, certify, and recertify their patients' need for home health care
- Order and supervise cardiac and pulmonary rehabilitation

2020 PAEA BOARD OF DIRECTORS

Howard Straker, EdD, MPA, PA-C
PRESIDENT

Michel Statler, MLA, PA-C
PRESIDENT ELECT

Jonathan Bowser, MS, PA-C
IMMEDIATE PAST PRESIDENT

Janie McDaniel, MS, MLS(ASCP)SC
SECRETARY

Carl Garrubba, MPA, PA-C, CPA
TREASURER

Nicole Burwell, PhD, MSHS, PA-C
DIRECTOR AT LARGE

Reamer Bushardt, PharmD, PA-C
DIRECTOR AT LARGE

Dipu Patel, MPAS, PA-C
DIRECTOR AT LARGE

Michael Roscoe, PhD, PA-C
DIRECTOR AT LARGE

Kevin Schuer, DrPH, PA-C
DIRECTOR AT LARGE

Linda Sekhon, DHSc, PA-C
DIRECTOR AT LARGE

Mary Ruggeri, MEd
STUDENT MEMBER AT LARGE

Sara Fletcher, PhD
EX OFFICIO MEMBER



- Certify their patients' need for therapeutic shoes for the treatment of diabetes
- Certify terminal illness and certify/recertify the need for hospice care

In addition to removing these unnecessary restrictions on the ability of PAs to practice at the top of their license, we would also urge CMS to examine additional unnecessary regulatory barriers that impede clinicians seeking to train the future health workforce. **Specifically, we urge the agency to remove the long-standing “physical presence” requirement that practitioners be in the exam room with a student during the performance of the billable portion of E/M services.**

While provider presence in the clinic is critical for patient care and safety, requiring continuous presence in the exam room is clinically unnecessary and impedes optimal practice efficiency. Further, long-term effectiveness as a clinician is highly dependent upon the ability of all students to develop progressively autonomous clinical judgment and critical thinking skills — an opportunity that is restricted by the existing physical presence requirement.

We welcome the opportunity to serve as a continued resource to CMS on this and other matters. Should you have specific questions, or if you would like additional information, please contact Director of Government Relations Tyler Smith at 703-667-4356 or tsmith@PAEAonline.org.

Sincerely,

A handwritten signature in black ink that reads "Howard Straker". The signature is stylized with a large, sweeping 'H' and 'S'.

Howard Straker, EdD, MPH, PA-C
President

A handwritten signature in black ink that reads "Sara G. Fletcher". The signature is written in a cursive style.

Sara Fletcher, PhD
Interim Chief Executive Officer