



National Association of Neonatal Nurses

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James T. Kerr
Centers for Medicare and Medicaid Services
Consortium for Medicare Health Plans Operations
Jacob K. Javits Federal Building
26 Federal Plaza, Room 3811
New York, NY 10278-0063

Dear Mr. Kerr-

The National Association of Neonatal Nurse Practitioners (NANNP) is working to assist Neonatal Nurse Practitioners (NNPs) who provide care to critically ill neonates in the United States. We are writing to you today to discuss the Centers for Medicare and Medicaid Services requirement that only a physician can direct respiratory care services. Although this rule allows Advanced Practice Registered Nurses (APRNs) in all specialties to write respiratory care orders, it also mandates that the “responsible doctor of medicine or osteopathy must co-sign the order.” For APRNs in 14 states which still require a physician “supervision or collaboration” relationship, this is a significant impediment to prompt access of risk appropriate care. For the neonatal Nurse Practitioners (NNPs) practicing in those states, this ruling causes significant duplication of workflow and unnecessary redundancy. The nurse practitioners caring for critically ill infants in the NICU can write hundreds of respiratory orders a day, depending on the size of the unit and the acuity level of the patients.

As President Obama has stated on numerous occasions, the nation must find ways to improve healthcare access and streamline process for providers so that care is delivered promptly, efficiently and in a cost-effective manner. This policy, which promotes inefficiency and redundancy of provider activities, increases the complexity and eventual cost of providing care. Patients are subsequently at increased risk of experiencing delays in therapy and experiencing poorer outcomes.

We urge you and your staff to reevaluate the original intent of this policy and to amend the language in order for APRNs to provide comprehensive care to their patients without unnecessary barriers. If our association can be of any assistance to you or your staff in this process, please do not hesitate to contact us.

Thank you for your time and consideration.

Sincerely,

Lori Armstrong
NANN President

Debra Sansoucie
NANNP Council Chair