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COLORADO NURSES ASSOCIATION

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President

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Dear Members of the Medical Services Board (MSB):

Thank you for the opportunity to provide comments on the proposed revision to the Medical Assistance Rule concerning Home Health Providers (MSB 20-10-12-A).

Colorado Nurses Association strongly supports the proposed changes, which bring Colorado into compliance with the Centers for Medicare & Medicaid Services (CMS) allowance of Advanced Practice Registered Nurses (APRNs), Nurse Practitioners, and Physician Assistance to order home health services.

We appreciate the Department of Health Care Policy and Financing (HCPF) for proposing updates in regulations to reflect the changes made by Section 3708 of the federal Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to allow an advanced practice nurse, nurse practitioner, clinical nurse specialist, and physician assistant, in addition to physicians, to order home health services. Because Medicare allows these practitioners to directly bill for services, it is consistent to allow them to perform these functions.

These changes and the impact of these changes during the pandemic has promoted physicians' working at the top of their license leading to more efficient and less expensive care. It will also expedite care for the many patients who are looking to be cared for in their homes rather than alternative care centers. This will ease the burden not only on physicians and their team but also on home health agencies and their patients. These changes will also further improve the continuity of care. Rural communities will especially benefit from this authorization as many have only APRNs as providers.

Colorado continues to lead in the nation in care delivery adaptations throughout this pandemic. These proposed changes are consistent with that leadership.

Thank you again for your attention to this critical rule revision. Please reach out if you have any questions.

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