



The Hospital + Healthsystem  
Association of Pennsylvania

*Leading for Better Health*

January 17, 2020

Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Service  
Attention: CMS-1720-P  
P.O. Box 8013  
Baltimore, MD 21244-1850

**Re: Scope of Practice: Executive Order #13890—Protecting and Improving Medicare for Our Nation's Seniors**

Dear Administrator Verma:

On behalf of The Hospital and Healthsystem Association of Pennsylvania (HAP), which represents approximately 240 member institutions, we appreciate the opportunity to comment on the President's Executive Order directing the Department of Health and Human Services (HHS) to propose a number of reforms to the Medicare program. Specifically, we are pleased to offer support for efforts to address supervision and licensure where current requirements are more stringent than other applicable federal or state laws, thereby limiting health care practitioners from practicing at the top of their professional license.

HAP appreciates the administration's ongoing efforts and commitment to ensuring that federal regulations not only reinforce current standards of practice but also promote improvements in the quality of care delivered by hospitals. HAP is pleased that the administration has chosen to make ongoing adjustments to its regulatory framework to focus attention on reducing barriers to care.

HAP's vision is "A Healthy Pennsylvania," and HAP's mission is to empower hospitals and health systems as the leading advocates for improving health in their communities. To be able to implement this vision, hospitals and health systems need to have a strong workforce that is able to provide care to their full practice authority in all patient care settings.

HAP is strongly opposed to statutory and regulatory barriers that unduly prevent any health care practitioner from caring for patients fully within their statutorily defined scope of practice. Improving access to care by optimizing the skill set of health care practitioners is vital.

The health care workforce has been identified as a major challenge for Pennsylvania. HAP convened a task force of its members to conduct a thorough analysis of hospital workforce needs. The result of this effort culminated in the development of a recommendation report. The utilization of practitioners to the top of their license and training was a key recommendation.

The changing nature of health care requires that all members of the health care team work together as part of an inter-professional team. In order to meet the growing health care needs



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in the commonwealth, every member of the health care team must be able to practice to the full extent of their education, training, and license.

Thank you for consideration of our comments regarding reforms to the Medicare program that seek to allow health care practitioners to practice at the top of their license. If you have any questions, please feel free to contact [me](#).

Sincerely,

A handwritten signature in black ink that reads "Jeffery W. Bechtel". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Jeffery Bechtel  
Senior Vice President  
Health Economics and Policy



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