



Promoting patient safety by enhancing provider quality.

May 29, 2014

RE: Letter Regarding ACA

The National Board of Certification and Recertification for Nurse Anesthetists (NBCRNA) strongly urges the Centers for Medicare & Medicaid Services (CMS) to act to ensure that health plans and health insurers do not discriminate against qualified licensed healthcare professionals solely on the basis of their licensure.

As CMS knows, Section 2706 of the Affordable Care Act (ACA) prohibits health plans and health insurers from discriminating against any healthcare provider who is acting within the scope of that provider's license or certification under applicable State law, when determining eligibility for reimbursement. In enacting this provision of the ACA, Congress clearly sought to protect a patient's right to access care from a full range of qualified providers, including qualified, licensed non-physician providers. Discriminating against non-physician providers reduces competition and concentrates economic benefits into the hands of select providers, thereby increasing costs for consumers and for the health care delivery system as a whole. This is particularly important in rural America where *underserved* populations are financially burdened by insurance companies which are not providing full reimbursement for anesthesia services. If the insurance company is not going to pay, then patients bear the burden of the balance, or worse, it may be one more reason that they forego needed care.

In 2010 The Institute of Medicine issued a report titled "[The Future of Nursing: Leading Change, Advancing Health](#)". The report underscores the crucial role of nursing in addressing the increased demand for services expected from healthcare reform legislation, and calls for an expanded role for advanced practice nursing. It urges elimination of state and federal barriers limiting this role. Section 2706 of the ACA is a critical step toward meeting the concerns addressed by the IOM.

The NBCRNA recognizes the importance of ensuring rigorous licensing and certification standards for providers as a means of protecting patients. The Certified Registered Nurse Anesthetist (CRNA) credential has long been recognized as a standard of excellence in the provision of anesthesia. The NBCRNA has been steadfast in our commitment to ensuring that patients who use nurse anesthesia services can be confident that the CRNA credential continues to reflect a commitment to excellence. The nurse anesthetist community has been preparing for the increased responsibilities inherent in the Affordable Care Act, and we recognize and embrace the important role nurse anesthetists play in delivering care that is safe, efficient, and cost-effective. The NBCRNA is enacting changes to the credentialing standards required for both new and continuing practitioners of nurse anesthesia to assure that our professional standards remain among the best in the healthcare industry.

In closing, we urge CMS to ensure that health plans and insurers offer the same reimbursement for a given service to any provider who is duly licensed and certified to provide it. You may be assured the quality of care and performance offered by nurse anesthetists fully justifies such action.

Sincerely,  
Charles Vacchiano, PhD, CRNA  
President, NBCRNA