



October 7, 2019

Jeffrey M. Zirger  
 Lead, Information Collection Review Office  
 Office of Scientific Integrity  
 Office of Science  
 Centers for Disease Control and Prevention

**Re: National Electronic Health Records Survey (NEHRS) Revision; (OMB Control No. 0920-1015);  
 Docket No. CDC-2019-0061**

Dear Mr. Zirger,

The American Association of Nurse Practitioners (AANP), representing more than 270,000 nurse practitioners (NPs) in the United States, appreciates the opportunity to comment on ways to enhance the quality, utility and clarity of the National Electronic Health Records Survey (NEHRS).

NPs are advanced practice registered nurses (APRNs) who are prepared at the masters or doctoral level to provide primary, acute, chronic and specialty care to patients of all ages and walks of life. Daily practice includes: assessment; ordering, performing, supervising and interpreting diagnostic and laboratory tests; making diagnoses; initiating and managing treatment including prescribing medication and non-pharmacologic treatments; coordinating care; counseling; and educating patients and their families and communities. NPs practice in nearly every health care setting including long-term care facilities, clinics, hospitals, Veterans Affairs and Indian Health Care facilities, emergency rooms, urgent care sites, private physician or NP practices (both managed and owned by NPs), schools, colleges, retail clinics, public health departments, nurse managed clinics, and home health. NPs hold prescriptive authority in all 50 states and the District of Columbia. NPs complete more than one billion patient visits annually.

Nurse practitioners currently provide a substantial portion of the high-quality<sup>1</sup>, cost-effective<sup>2</sup> health care that our communities require, and will continue to do so to meet the needs of their communities. As of 2017, there were more than 130,000 NPs billing for Medicare services, making NPs the largest and fastest growing Medicare designated provider specialty.<sup>3</sup> In the commercial health care market, between 2012-2016 the number of office visits to primary care physicians declined by 18% while the number of office visits to NPs and PAs increased by 128%.<sup>4</sup> NPs have a particularly large impact on primary care as approximately 73% of all NP graduates deliver primary care<sup>5</sup>. NPs comprise approximately one quarter of our primary care workforce, with that percentage growing annually.<sup>6</sup>

<sup>1</sup> <https://www.aanp.org/images/documents/publications/qualityofpractice.pdf>.

<sup>2</sup> <https://www.aanp.org/images/documents/publications/costeffectiveness.pdf>.

<sup>3</sup> [https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/CMSProgramStatistics/2017/Downloads/PROVIDERS/2017\\_CPS\\_MDCR\\_PROVIDERS\\_6.PDF](https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/CMSProgramStatistics/2017/Downloads/PROVIDERS/2017_CPS_MDCR_PROVIDERS_6.PDF)

<sup>4</sup> <https://www.healthcostinstitute.org/research/publications/hcci-research/entry/trends-in-primary-care-visits>.

<sup>5</sup> <https://www.aanp.org/about/all-about-nps/np-fact-sheet>.

<sup>6</sup> [Rural and Nonrural Primary Care Physician Practices Increasingly Rely On Nurse Practitioners](#), Hilary Barnes, Michael R. Richards, Matthew D. McHugh, and Grant Martsolf, *Health Affairs* 2018 37:6, 908-914.

The CDC requested feedback on ways to enhance the quality and utility of information collected through the NEHRS, an important tool for collecting data regarding the adoption and utilization of electronic health records. Unfortunately, the current NEHRS is focused on surveying office-based physicians and does not include surveying office-based nurse practitioners. Approximately 95% of nurse practitioners utilize electronic health records in their clinical setting. Over a third report having a role in purchasing an electronic health records system for their primary work site. The most common practice settings for nurse practitioners are the office-based settings that are included in this survey. **To obtain an accurate representation of the health care workforce it is essential that NPs are added to the sample of providers in office-based settings.**

Additionally, the NEHRS uses the term “mid-level provider” when referring to NPs and other health care providers (question 9). NPs are licensed, independent practitioners who work throughout the entire health care spectrum from health promotion and disease prevention to diagnosis and treatment of patients with acute and chronic illnesses. **AANP strongly disagrees with the use of this term and requests that the CDC retire its usage in the NEHRS and all other surveys and communications.**

This label originated decades ago and it is not compatible with NP licensure. The term fails to recognize the established national scope of practice for the NP role and the authority of NPs to practice to the full extent of their education and clinical preparation. HHS has recently stated they are not using the term given the “increasingly critical and advanced roles that PAs and APRNs play within the clinic environment.”<sup>7</sup> The term confuses health care consumers due to its vague nature and is not a true reflection of the NP role. The term “mid-level provider” implies an inaccurate hierarchy within clinical practice. Nurse practitioners have a steadfast reputation for safe practice and the provision of high quality care. It is well established that patient outcomes for NPs are comparable to physicians. **The CDC should retire the use of this term as it is outdated language that does not reflect the quality of care provided by NPs and their importance to the health care system.**

We thank you for the opportunity to comment on the NEHRS. Should you have comments or questions, please direct them to MaryAnne Sapio, V.P. Federal Government Affairs, [msapio@aanp.org](mailto:msapio@aanp.org), 703-740-2529.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Hebert", with a long horizontal flourish extending to the right.

David Hebert  
Chief Executive Officer

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<sup>7</sup> 84 FR 7714, 7728 (see footnote 42).

Dear Mr. Hebert,

Thank you for your thoughtful letter requesting 1) the inclusion of nurse practitioners in the National Electronic Health Records Survey (NEHRS) sample of providers in office-based settings, and 2) the removal and replacement of the term “mid-level provider” in the NEHRS and all other surveys and communications.

Nurse practitioners do not currently fall under the scope of the NEHRS, which at this time is limited to office-based physicians. However, we have added your letter to our folder of items to consider for future NEHRS planning. Meanwhile, we have replaced the term “mid-level provider” with “advanced practice provider” in accordance with the Department of Health and Human Services’ definition given in 84 FR 7714.

Sincerely,

The National Electronic Health Records Survey (NEHRS) Investigative Team  
The National Center for Health Statistics