American Nurses Association

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ANA Supports Adequate RN Staffing, APRN Recognition In Comments to CMS on Hospital Conditions of Participation

SILVER SPRING, MD – The American Nurses Association (ANA) supports proposed changes in Medicare and Medicaid rules for hospitals that would support the work of millions of registered nurses (RNs) and advanced practice registered nurses (APRNs), allowing them to provide more efficient and higher quality care to patients.

In comments submitted Dec. 16 to the Centers for Medicare and Medicaid Services (CMS), ANA encourages CMS to work together to improve guidelines to ensure nurse staffing is adequate to provide high-quality care for Medicare and Medicaid patients. Recommendations include implementation of hospital-wide staffing plans that identify an appropriate number of RNs on each unit to meet patients' needs; annual evaluation of staffing plans that analyze patient outcomes attributable to nursing care; and public posting of staffing plans.

ANA also advocates revisions that would enhance the ability of APRNs, such as nurse practitioners and certified nurse-midwives, to secure hospital clinical and admitting privileges and membership on medical staff. Such status would allow APRNs to work to the full extent of their education, skills and licensure, and provide more comprehensive care to patients. In the comments, ANA urges consistent recognition of the increasing role of APRNs.

ANA's comments on CMS' proposed changes to the Medicare/Medicaid "Conditions of Participation" — the guidelines hospitals must follow to qualify for involvement and reimbursement under the health programs — reflect changing trends in health care and aim to take full advantage of nurses' capabilities. The conditions also serve as guidelines for the Joint Commission and other private accrediting bodies that evaluate hospitals. CMS proposed modifications to the rules in October to reflect changes in current practice, and took into account the Obama Administration initiative to reduce regulatory burdens.

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In its comments, ANA urges CMS to retain consistent reporting requirements for all deaths related to the use of patient restraints, including soft wrist restraints, to assure that patients' safety and rights are protected. Longstanding ANA policy states that "only when there is no other viable option should restraints be employed."

ANA also backs these CMS proposals that directly affect nursing practice and patient care for the roughly 60 percent of all U.S. RNs who work in hospitals:

- Allowing the nursing care plan to be part of the interdiscliplinary care plan;
- Expanding the use of standing orders and protocols for nurses to give medications;
- Permitting patients to take their own medications under certain circumstances;
- Deleting the requirement for verbal orders to be signed within 48 hours; and
- Allowing flexibility for infection control programs, which nurses often lead.

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The ANA is the only full-service professional organization representing the interests of the nation's 3.1 million registered nurses through its constituent and state nurses associations and its organizational affiliates. The ANA advances the nursing profession by fostering high standards of nursing practice, promoting the rights of nurses in the workplace, projecting a positive and realistic view of nursing, and by lobbying the Congress and regulatory agencies on health care issues affecting nurses and the public.

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