



September 14, 2026

Mehmet Oz, MD, MBA

Administrator, Centers for Medicare & Medicaid Services

Department of Health and Human Services

7500 Security Boulevard

Baltimore, MD 21244

RE: Medicare and Medicaid Programs; CY 2027 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment and Coverage Policies; Medicare Shared Savings Program Requirements; and Medicare Prescription Drug Inflation Rebate Program [CMS-1848-P]

Dear Administrator Oz,

The American Association of Colleges of Nursing (AACN) appreciates the opportunity to comment on the Centers for Medicare and Medicaid Services' (CMS) Calendar Year (CY) 2027 Medicare Physician Fee Schedule (PFS) proposed rule. As the national voice for academic nursing, AACN represents more than 890 schools of nursing offering baccalaureate, graduate, and post-graduate programs at public and private universities nationwide, which engage more than 570,000 students and 58,000 faculty members.¹ These institutions prepare Registered Nurses (RNs) and Advanced Practice Registered Nurses (APRNs)² who are essential to meeting the nation's growing demand for faculty, researchers, and frontline providers.

AACN has a vested interest in improving our nation's health as nursing students prepare to provide evidence-based, high-quality care. Within AACN member schools, a total of 283,303 students were enrolled in entry-level BSN programs in the 2025-2026 academic year, with an additional 195,771 enrolled in post-baccalaureate programs.³ The critical contributions of current and future nurses is seen across our country daily and were recognized by President Trump in his 2026 National Nurses Day statement, where he noted, "In every circumstance, America's nurses tend to what matters most in life—safeguarding our

¹ American Association of Colleges of Nursing. (2026) About the American Association of Colleges of Nursing. Retrieved from: <https://www.aacnnursing.org/About-AACN>.

² APRNs include certified nurse-midwives (CNMs), certified registered nurse anesthetists (CRNAs), clinical nurse specialists (CNSs) and nurse practitioners (NPs).

³ American Association of Colleges of Nursing. (2026) Schools of Nursing See Enrollment Increases Across Most Program Levels, Signaling Strong Interest in Nursing Careers: PhD Programs Report 11th Consecutive Year of Enrollment Declines. Retrieved from: <https://www.aacnnursing.org/news-data/all-news/article/schools-of-nursing-see-enrollment-increases-across-most-program-levels-signaling-strong-interest-in-nursing-careers-1480>.

THE VOICE OF ACADEMIC NURSING

655 K Street, NW, Suite 750 • Washington, DC 20001 • 202-463-6930
www.aacnnursing.org

health and protecting the well-being of those we love with unmatched resolve.”⁴ As CMS looks at ways to reduce barriers and elevate care for patients in all communities, AACN offers the following recommendations for consideration in the CY 2027 PFS final rule.

Request for Information: Redesigning Primary Care to Make America Healthy Again:

Primary care is foundational to improving health outcomes, advancing prevention, and ensuring access to timely, coordinated care, particularly for Medicare beneficiaries who often have complex and ongoing health needs. As CMS is aware, investment in educational pathways, not just in primary care, but across all care settings including behavioral health, is critical to meeting these healthcare needs of the nation. This includes supporting the growing demand for nurses. The preparation of future nurses depends not only on the strength of nursing education programs, but also on the availability of clinical training opportunities and experienced preceptors to guide students in practice.

As the demand for healthcare continues to grow, especially in rural and underserved communities, CMS should support investments that strengthen the nursing workforce to meet this need. One solution that would make a significant difference is implementation of a permanent Medicare funding stream under which hospitals receive payments for the costs associated with providing clinical training for APRNs. Previous initiatives, such as the Graduate Nurse Education (GNE) Demonstration, have showcased the value of stronger partnerships between academic institutions and healthcare organizations by increasing APRN enrollment and graduation, and expanding clinical training opportunities.⁵ A long-term, sustainable funding mechanism could further incentivize clinicians to serve as nurse preceptors, strengthen academic-practice partnerships, and expand high-quality clinical education opportunities, ultimately supporting workforce readiness and access to care for Medicare beneficiaries and communities across the nation.

Artificial Intelligence (AI) Initiatives: AACN encourages CMS to carefully consider the implications of technology-enabled healthcare services, including the use of artificial intelligence and other digital tools. These tools and policies should recognize the value of these technologies while also ensuring that innovation complements, not replaces, the clinical judgment, patient relationships, and care coordination provided by nurses and other healthcare professionals. AI oversight and guidance needs to be considered, so these technologies can support and enhance healthcare—without compromising ethics, safety, or professional values.⁶ From the design phase to implementation and evaluation, we urge CMS to include

⁴ The White House. (May 6, 2026) Presidential Message on National Nurses Day. Retrieved from: <https://www.whitehouse.gov/briefings-statements/2026/05/presidential-message-on-national-nurses-day/>.

⁵ IMPAQ. (2019) The Graduate Nurse Education Demonstration Project: Final Evaluation Report. Retrieved from: <https://innovation.cms.gov/files/reports/gne-final-eval-rpt.pdf>.

⁶ American Association of Colleges of Nursing. (2025) Thought Leaders Assembly: Examining the Potential of AI to Transform Nursing Education. Retrieved from: <https://www.aacnnursing.org/Portals/0/PDFs/Reports/Thought-Leadership/AACN-2025-Thought-Leaders-Assembly-Summary.pdf>.

nurse educators, nurses, and APRNs in each step of the process to ensure the best outcomes for providers and patients alike.

Telehealth Flexibilities and Modifiers: AACN supports CMS' continued efforts to integrate telehealth across the Medicare program and maintain access to remote care, particularly for Medicare beneficiaries in rural and underserved communities and those with limited mobility. APRNs play a critical role in delivering care through telehealth, and CMS should ensure that Medicare policies support their ability to provide these services. AACN encourages CMS to make proven telehealth flexibilities during the pandemic era permanent and to work with Congress to establish these permanent provisions.

Accountable Care Organizations (ACOs): APRNs, including NPs, play an essential role in ACOs by delivering coordinated, high-quality care across all patient populations. In fact, NP-led care has demonstrated positive patient outcomes and cost savings and supports effective management of chronic conditions, particularly for Medicare beneficiaries and patients in rural and underserved areas.⁷ CMS should ensure that ACO policies and payment methodologies appropriately recognize the contributions of APRN-led care to quality improvement, patient outcomes, care coordination, and responsible stewardship of Medicare resources. We support ongoing efforts to recognize and strengthen the role of APRNs and NPs in ACOs and encourage policies that incentivize ACOs to engage with new providers, including APRNs and NPs.

Incident-to Billing: AACN recognizes that incident-to billing can create barriers to appropriately recognizing APRNs, particularly when services provided by APRNs are billed under a physician. In MedPAC's June 2019 report, the commissioners or advisors recommended eliminating incident-to billing for APRNs.⁸ MedPAC further outlined this elimination would, "update Medicare's payment policies to better reflect current clinical practice."⁹ As CMS continues its work, establishing and requiring usage of an incident-to modifier would be a good first step and could provide CMS with accurate information on who is providing the service.

Inclusion of the Nursing Perspective in Healthcare Policy: Nurses bring valuable firsthand knowledge to policymaking through their direct and sustained involvement in patient care and their understanding of the challenges affecting patients, families, and healthcare systems.

⁷ American Association of Nurse Practitioners. (October 2025) Nurse Practitioners in Primary Care. Retrieved from: <https://www.aanp.org/advocacy/advocacy-resource/position-statements/nurse-practitioners-in-primary-care>

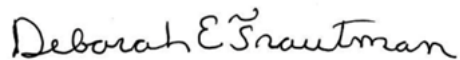
⁸ Medicare Payment Advisory Commission. (June 2019) Report to Congress: Medicare and the Health Care Delivery System. Page XVIII. https://www.medpac.gov/wp-content/uploads/import_data/scrape_files/docs/default-source/reports/jun19_medpac_reporttocongress_sec.pdf.

⁹ Ibid, 158.

Although nurses represent the largest healthcare profession,¹⁰ they remain underrepresented on federal advisory committees, task forces, and councils. Their education, clinical expertise, and experience position nurses to provide meaningful insight into policies related to healthcare delivery, workforce development, clinical quality, and patient outcomes. Ensuring that nursing expertise is reflected in policy is particularly important as CMS considers policies that influence how services are defined, valued, and reimbursed. CMS should promote greater representation of nurses throughout decision-making processes, including on advisory committees and other policymaking bodies to help ensure that payment recommendations and regulatory developments accurately reflect the full range of professionals delivering care.

Thank you for your consideration of AACN's comments on the CY 2027 PFS proposed rule. Ensuring nurses' perspectives are reflected in CMS policy will safeguard access, strengthen care coordination, and improve outcomes for Medicare beneficiaries. Please consider AACN an ally in this endeavor. If our organization can be of any assistance, contact AACN's Chief Government Affairs and Policy Officer, Rachel Minahan, at rminahan@aacnnursing.org.

Sincerely,

A handwritten signature in black ink that reads "Deborah E. Trautman". The script is cursive and fluid.

Deborah E. Trautman, PhD, RN, FAAN
President and Chief Executive Officer

¹⁰ Smith, Sean and Blank, Andrew. U.S. Bureau of Labor Statistics. (June 2023) Healthcare Occupations: Characteristics of the Employed. Slide Two: Employment in the 25 largest healthcare occupations, 2022. Retrieved from: <https://www.bls.gov/spotlight/2023/healthcare-occupations-in-2022/>.