

February 20, 2018

The Honorable Peter Roskam  
Chair, Subcommittee on Health  
House Ways and Means Committee  
1102 Longworth House Office Building  
Washington, DC 20515

RE: Removing Barriers to Prevent and Treat Opioid Abuse and Dependence in Medicare

Dear Chairman Roskam,

The American Association of Colleges of Nursing (AACN) offers the following comments in response to the hearing titled *Hearing on the Opioid Crisis: Removing Barriers to Prevent and Treat Opioid Abuse and Dependence in Medicare* held by the House Committee on Ways and Means, Subcommittee on Health on February 6, 2018.

As the national voice for academic nursing, AACN has a vested interest in improving health and health care. For nearly five decades, the association has established quality standards for professional nursing education to ensure that the workforce of Registered Nurses (RNs) and Advanced Practice Registered Nurses (APRNs; which include nurse practitioners (NPs), certified nurse-midwives (CNMs), certified registered nurse anesthetists (CRNAs), and clinical nurse specialists (CNSs)) is prepared to provide evidence-based and cost-effective care. Within AACN member schools, there are over 95,000 students enrolled in APRN programs who will serve as the next generation of providers.<sup>1</sup>

Standing with our colleagues in the APRN community, AACN brings to your attention a viable option to help curb opioid abuse prevention and treatment in the Medicare system. The current exclusion of certain APRN roles to be able to prescribe Medication Assisted Treatment (MAT) and reconsidering the time limits in which they may do so will help expand access to care.

AACN is acutely aware that deaths related to opioids increases yearly. From 1999 to 2016, deaths involving prescription opioids increased fivefold to more than 200,000 people and sales of these prescription drugs quadrupled.<sup>2</sup> The opioid epidemic is ravaging communities in every corner of our country. Its far-reaching effect has taken the lives of adults and youths alike, hitting rural and urban populations, and devastating families. Nurses have proven their deep commitment to the health care of our nation and are on the frontlines caring for some of our most vulnerable communities hit the hardest. They work in emergency rooms, community, and behavioral health clinics, schools and faith based organizations. Nursing is part of the solution to opioid crisis.

AACN supported the Comprehensive Addiction and Recovery (CARA) Act while in Congress and now its implementation that has included NPs and Physician Assistants (PAs) in key provisions. Most notably, the ability for NPs and PAs to prescribe medication-assisted

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<sup>1</sup> American Association of Colleges of Nursing. (2017). *Enrollments and Graduations in Baccalaureate and Graduate Programs in Nursing*. Washington, DC.

<sup>2</sup> Centers for Disease Control and Prevention. *Prescription Opioid Overdose Data*. Retrieved from <https://www.cdc.gov/drugoverdose/data/overdose.html>

treatment (MAT), which combines medication and behavioral therapy that research indicates can successfully treat these disorders.<sup>3</sup>

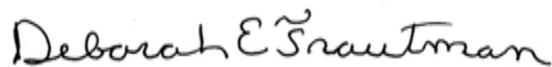
To meet the additional educational requirement as outlined in the CARA Act, the American Association of Nurse Practitioners and American Society of Addiction Medicine collaborated on developing and providing additional training on MAT. This law has spurred an increase in an NP's ability to apply for a MAT waiver. According to AANP, they have successfully trained over 4,500 NPs.

During the drafting of the CARA legislation, there were stipulations for NPs limiting this expansion to five years and permitting only one type of APRN to prescribe MAT (NPs). While this marks a step in the right direction, the current law does not maximize the full potential of the APRN workforce. There are approximately 267,000 APRNs in the U.S., which in addition to NPs (approximately 220,000) includes 70,000 CNSs— many whom work in behavioral health, 52,000 CRNAs— many who manage chronic and acute pain, and 11,000 CNMs— many who treat opioid-dependent mothers but the infants with fetal abstinence syndrome.<sup>4</sup> The exclusion of almost half the APRN workforce severely limits access for patients who are suffering from opioid use disorders.

We recommend utilizing the entire APRN workforce to the full extent of their education and training.<sup>5</sup> We strongly encourage the Committee to support the bicameral and bipartisan legislation, the Addiction Treatment Access Improvement Act of 2018 (H.R. 3692/S. 2317). This legislation eliminates the time restriction on their ability to prescribe MAT and expands the definition of provider to include all four APRN roles. This is a timely and viable solution to removing barriers for treatment to Medicare patients.

Thank you for your consideration of these comments on *Hearing on the Opioid Crisis: Removing Barriers to Prevent and Treat Opioid Abuse and Dependence in Medicare*. This conversation is essential to improving efficiency in our nation's health care and most importantly, safety for everyone effected by this crisis. Please consider AACN an ally in this endeavor. If our organization can be of any assistance, please contact Director of Government Affairs, Lauren Inouye at [linouye@aacnnursing.org](mailto:linouye@aacnnursing.org) or Director of Policy, Colleen Leners at [cleners@aacnnursing.org](mailto:cleners@aacnnursing.org).

Sincerely,



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

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<sup>3</sup> Substance Abuse and Mental Health Services Administration. *Medication and Counseling Treatment*. Retrieved from <https://www.samhsa.gov/medication-assisted-treatment/treatment>

<sup>4</sup> National Council of State Boards of Nursing. *The Consensus Model for APRN Regulation, Licensure, Accreditation, Certification and Education*. Retrieved from <https://ncsbn.org/aprn-consensus.htm>

<sup>5</sup> The National Academies of Sciences, Engineering and Medicine. *The Future of Nursing: Leading Change, Advancing Health*. Retrieved from <http://www.nationalacademies.org/hmd/Reports/2010/The-Future-of-Nursing-Leading-Change-Advancing-Health.aspx>

Cc: The Honorable Sam Johnson  
The Honorable Devin Nunes  
The Honorable Vern Buchanan  
The Honorable Adrian Smith  
The Honorable Lynn Jenkins  
The Honorable Kenny Marchant  
The Honorable Diane Black  
The Honorable Erik Paulsen  
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