



NATIONAL ASSOCIATION OF
CLINICAL NURSE SPECIALISTS

September 29, 2005

The Honorable Michael O. Leavitt
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

Dear Secretary Leavitt:

The National Association of Clinical Nurse Specialists represents 1800 advanced practice nurses (APRNs) in the United States. Our membership urges you to immediately add ABC codes to the national HIPAA code set.

Our organization has sought to gain billing parity for advanced practice nursing care for many years. With the addition of ABC codes under HIPAA, APNs will achieve the benefits available to our physician colleagues. Some of these benefits include:

- Reductions in paperwork burdens;
- Reductions in the cost of processing health care claims;
- Access to claims data that will point to effective nursing care;
- Increased access to managed care provider networks; and
- Increased referrals from insurance companies.

Our organization led the development of fifty-seven ABC codes for nursing assessments and management published in the 2005 version of the "ABC Coding Manual for Integrative Healthcare."

Senator Grassley helped pass legislation granting all APNs the right to directly bill insurance companies in every state. However, without codes, APNs are either forced to use CPT codes that do not describe the nursing patient encounter (a HIPAA violation) or face a distinct barrier to practice.

We understand that you have suggested applying to the government's HCPCS II coding authorities, one code at a time, for interventions that Alternative Link deems critical to patient care. You may not realize that most of the ABC codes are applicable to palliative care (care for the dying) or that APNs specialize in this important area of patient care.

Without ABC codes, advance nursing care remains invisible to policymakers, insurance companies and other data standard users. Our profession is not able to use claims data to replicate effective nursing care with current code sets. With ABC codes, our profession will quickly achieve these end points.

Nursing coding and terminology experts were not included in the review of ABC codes. If you remain unconvinced that ABC codes are needed to reduce costs in healthcare, we offer our expertise as research specialists in nursing to help reassess the cost benefits of ABC codes. As this is a national undertaking, we would seek funding to manage this review.

Sincerely,

Christine Carson Filipovich

Christine C. Filipovich, MSN, RN
Executive Director