



**TESTIMONY**

Delivered by Tracy Wodatch, Vice President of Clinical and Regulatory Services  
The Connecticut Association for Healthcare at Home

Before the Public Health Committee

**March 20, 2013**

**Raised Bill No. 6391  
An Act Concerning the Practice of Advanced Practice Registered Nurses**

Senator Gerratana, Representative Johnson and members of the Public Health Committee. My name is Tracy Wodatch, Vice President of Clinical and Regulatory Services at the Connecticut Association for Healthcare at Home. I am also an RN with 30 years experience in home health, hospice, long term and acute care.

The Association represents 60 licensed and certified home health and hospice agencies that perform 5-million home health and community-based visits in our inner cities and rural Connecticut towns each year.

With a growing Connecticut workforce of 11,000 employees and skilled nurses, we are the *only* health providers that walk through the front doors of 14,000 state residents each day and understand the value that our provider agencies brings to person-centered care.

**The CT Association for Healthcare at Home opposes raised Bill No. 6391  
An Act Concerning the Practice of Advanced Practice Registered Nurses as  
written.**

The goal of this bill is to remove the requirement that advanced practice registered nurses practice in collaboration with a licensed physician. Although this may make good sense for most care settings, the federal regulations for home health and hospice require physician certification and physician approval of all plans of care. If APRNs were to work independently, they would not be able to oversee their patients' care while receiving home health and hospice services which would be a significant barrier to smooth transitions of care and optimal person-centered care from a known care provider.

The Medicare Condition of Participation for Home Health Agencies specific to Medical Supervision (§ 484.18) is as follows: *Patients are accepted for treatment on the basis of a reasonable expectation that the patient's medical, nursing, and social needs can be met adequately by the agency in the patient's place of residence. Care follows a written plan of care established and periodically reviewed by a doctor of medicine, osteopathy, or podiatric medicine.*



CONNECTICUT ASSOCIATION FOR  
**HEALTHCARE AT HOME**

This federal requirement has been a long-standing challenge for the home health and hospice providers as we are the only licensed and certified provider who cannot accept APRN or PA orders. Our Association in collaboration with our state partner associations, the National Association for Home Care and Hospice (NAHC) and the Visiting Nurse Association of America (VNAA) have been advocating at the national level to allow APRNs to sign home health and hospice orders most especially their certification and plans of care and certification.

Unfortunately, until the federal regulations for home health and hospice change, I don't believe this bill could achieve its intended purpose.

Thank you and if you have any further questions, please contact me directly at [Wodatch@cthealthcareathome.org](mailto:Wodatch@cthealthcareathome.org) or 203-774-4940.