



March 20, 2020

Administrator Seema Verma
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244-1850

Dear Administrator Verma:

On behalf of the diabetes care and education specialists on the frontlines of the COVID-19 pandemic, we applaud the Centers for Medicare & Medicaid Services (CMS) for your quick and decisive action in expanding telehealth benefits for Medicare beneficiaries during the outbreak. We have been communicating this information to our members as it becomes available, and our members are appreciative of the information and the relief it brings.

We have received an influx of questions from our members who are registered nurses (RNs) and pharmacists. RNs and pharmacists are not included on the list of healthcare providers eligible to facilitate Medicare services via telehealth at this time, yet they are explicitly identified within the National Standards for Diabetes Self-Management Education and Support (DSMES) as providers who can furnish DSMES services that are reimbursed under the Diabetes Self-Management Training benefit (DSMT)¹. The two national accrediting organizations for DSMT, the ADA ERP and the ADCES DEAP, accredit entities providing DSMT services based on the National Standards for DSMES. These standards have been approved by CMS as meeting or exceeding the standards set forth at 42 CFR 410.14.² Below is the specific language in the National Standards for DSMES describing the roles of RNs and pharmacists in providing DSMT:

“Registered nurses, registered dietitian nutritionists, pharmacists, and members of health care disciplines that hold a certification as a CDE or BC-ADM can perform all the DSMES services, including clinical assessments.”³

Not only are RNs and pharmacists explicitly identified in the National Standards for DSMES, both ADCES and the ADA have ascertained from our data that over 50% of our DSMT programs are run by RNs and pharmacists and many more are key instructors for these programs. In addition, over 95 percent of Americans live within five miles of a retail pharmacy. Pharmacists are one of the most accessible healthcare providers for many Americans, and they already perform a wide range of health services beyond prescriptions and over-the-counter medical products. Within the scope of practice of pharmacists is the ability to conduct health and wellness testing, to

¹ DSMES/T is a critical element of care for all people with diabetes. Diabetes self-management education and support is the ongoing process of facilitating the knowledge, skills, and ability necessary for diabetes self-care as well as activities that assist a person in implementing and sustaining the behaviors needed to manage his or her condition on an ongoing basis, beyond or outside of formal self-management training ([Source](#))

² <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/DSMT-Accreditation-Program>

³ https://www.diabeteseducator.org/docs/default-source/practice/deap/standards/nationalstandards_2017.pdf?sfvrsn=2

manage chronic diseases and medication, to administer immunizations, to work and partner with others in the health care frontlines to advance health and wellness, and to help reduce the need for doctor, clinic or hospital visits.

Currently most hospitals, facilities, and state and local health departments have banned group classes to reduce the risk for people with chronic diseases, like diabetes. Expanding telehealth services for Medicare beneficiaries at this time is critical, but as you can see from our program data; excluding pharmacists and RNs deeply and adversely impacts our programs' ability to provide DSMT services to at-risk beneficiaries.

We hope that CMS can act swiftly to ensure that all eligible DSMT instructors are able to provide DSMT services via telehealth.

We know diabetes is a priority for this Administration and the Agency, especially as diabetes management via telehealth was referenced in a recent press releases and press conference:

"President Trump's announcement comes at a critical time as these flexibilities will help healthcare institutions across the nation offer some medical services to patients remotely, so that healthcare facilities like emergency departments and doctor's offices are available to deal with the most urgent cases and reduce the risk of additional infections. For example, a Medicare beneficiary can visit with a doctor about their diabetes management or refilling a prescription using telehealth without having to travel to the doctor's office."

We believe that a temporary programmatic change by CMS will make the remarks in CMS' press release truly actionable.

Finally, in helping our members navigate this challenging and unprecedented time, we are reminded that there are people's lives behind the data. We have compiled a sample of questions and concerns raised by our DSMT providers, specifically RNs and pharmacists. We hope this information will help to support and expedite CMS' decision-making process. We have also compiled a map (see Appendix 1) to show both ADA recognized and ADCES accredited programs across the country that are led by RNs and pharmacists—50% of DSMT programs. While this number is large, it is important to keep in mind that a large majority of these locations employ many nurse and often multiple pharmacists, who are also unable to provide DSMT to their patients due to social distancing measures.

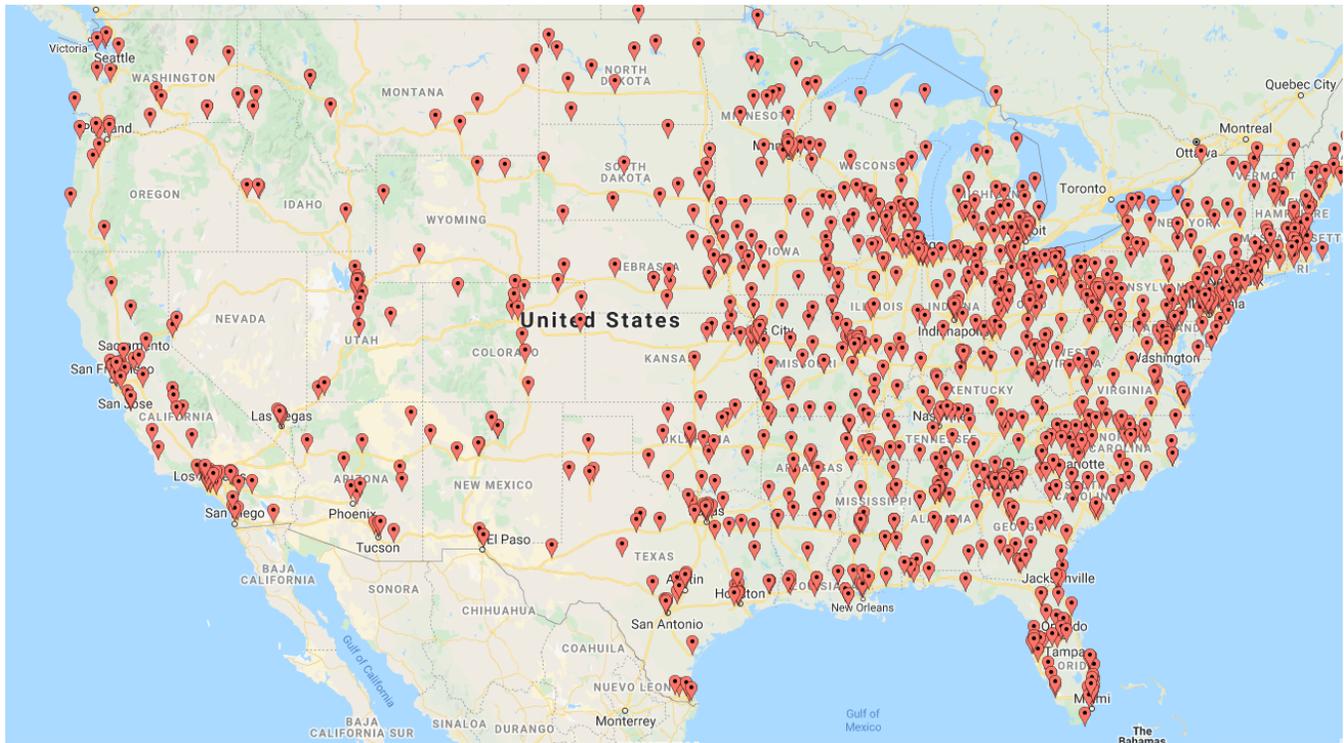
We appreciate your leadership during this critical time and appreciate your consideration of our request. Please contact Sacha Uelmen, ADCES' Director of Diabetes Education and Prevention Programs at suelmen@adces.org or Uzma Quraishi, ADA's Managing Director, Education Recognition Program at UQuraishi@diabetes.org with any questions.

Sincerely,

Association of Diabetes Care & Education Specialists
American Diabetes Association

Appendix 1

US Map showing ADA Recognized and ADCES accredited DSMT programs led by RNs and Pharmacists and national impact expanding telehealth for DSMT.



<https://batchgeo.com/map/88bdc30f23dd08c913369429cbe7577a>