

October 14, 2020

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Mary Weber, MLS, CPC  
Clinical Program Consultant  
UnitedHealthcare Clinical Services  
9900 Bren Road East  
Minnetonka, MN 55343  
SENT VIA EMAIL TO: [mary\\_weber@uhc.com](mailto:mary_weber@uhc.com)

Re: Denials to Advanced Practice Providers for dental appliance referrals

Dear Ms. Weber,

I am contacting you on behalf of the American Academy of Sleep Medicine (AASM), the premiere membership organization for sleep professionals and centers. The AASM is a membership organization representing over 10,000 sleep medicine practitioners and sleep centers.

An AASM member recently alerted AASM to a concern about a number of denials received when Physician Assistants or Nurse Practitioners (Advanced Practice Providers, or APPs) refer patients for dental appliances. Upon review of the UnitedHealthcare [Obstructive Sleep Apnea Treatment policy](#), effective April 2020, we noted that the Required Clinical Information includes “Prescription or referral from the treating physician for oral appliance therapy.”

While the AASM [Clinical Practice Guideline for the Treatment of Obstructive Sleep Apnea and Snoring with Oral Appliance Therapy](#) defined a physician as “a physician who is either sleep board-certified or sleep board eligible,” future AASM publications, including the [Clinical Use of a Home Sleep Apnea Test](#) position statement later indicate that the term “physician” refers to a medical provider who is licensed to practice medicine. Sleep medicine physicians regularly partner with APPs to provide high quality care to patients with sleep disorders. A 2014 study, in which AASM member centers were surveyed to evaluate APP utilization, roles, and educational backgrounds within the field of sleep medicine, found that approximately 40% of responding member sleep centers utilize APPs in predominantly clinical roles<sup>i</sup>, which aligns with the feedback consistently received from the AASM’s APP Sleep Team Assembly.

In addition, like many other specialties, sleep medicine faces a shortage of physicians to treat and diagnose patients with sleep disorders. APPs are stepping up to meet the demands of this physician shortage, especially in rural areas that already have an issue with access to care. For example, a nurse practitioner's practice includes, but is not limited to, assessment, ordering, performing, supervising and interpreting diagnostic and laboratory tests, making diagnoses, initiating and managing treating, coordinating care, counseling and patient and family education. Depending on their state's scope of practice laws and regulations, nurse practitioners either practice autonomously (full practice), in a regulated collaborative agreement or reduced scope (reduced practice) or in a supervised environment or restricted scope (restricted practice). Physician assistants must practice with a collaborating physician; however, state laws dictate the extent of that relationship. It is important to understand the scope of practice of these populations of skilled medical professionals on a state-by-state basis and implement coverage policies accordingly.

The AASM encourages UnitedHealthcare to modify the language in your current medical policy to allow for referrals from Advance Practice Providers, as it is clear they are providing this service, amongst many others, throughout sleep centers. If you have any questions about this issue, please contact AASM Director of Health Policy, Diedra Gray, at (630) 737-9700 or [dgray@aasm.org](mailto:dgray@aasm.org).

Sincerely,

Kannan Ramar, MD  
*AASM President*

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<sup>i</sup> Colvin L, Cartwright Ann, Collop N, Freedman N, McLeod D, Weaver TE, Rogers AE. Advanced practice registered nurses and physician assistants in sleep centers and clinics: a survey of current roles and educational background. *J Clin Sleep Med* 2014;10(5):581-587.