

Ensure Access to Continuous Skilled Nursing for Medically Complex Patients

Continuous skilled nursing services, currently referred to as private duty nursing (PDN), provide life-sustaining, in-home care for medically complex children and adults. These patients often depend on ventilators, tracheostomies, and other advanced supports, requiring skilled nursing care for extended hours each day.

Despite its critical role in preventing institutionalization and reducing overall healthcare costs, the current policy framework governing these services is outdated, inconsistent, and poorly aligned with the needs of this population.

Who Relies on Continuous Skilled Nursing

Children with Complex Needs

Ventilator-dependent / medically fragile youth

Adults with Disabilities

Need daily skilled support at home to live safely and independently

High-Acuity Older Adults

Complex chronic or post-acute conditions

Family Caregivers

Depend on reliable in-home nursing to work, care, and avoid crises

The Problems

Outdated and Misaligned Federal Standards Medicare Conditions of Participation (CoPs) governing home health agencies are designed for intermittent, post-acute care and are not appropriate for continuous, high-acuity skilled nursing services delivered in the home.

Lack of a Clear, Consistent Definition The current regulatory definition of PDN is vague and inconsistently applied across states, leading to confusion in coverage, oversight, and delivery.





Fragmented Quality Measurement There are no national metrics to evaluate outcomes such as hospitalizations, patient satisfaction, or workforce stability for this population.

Barriers to Access Delays in care authorization and systemic bias toward institutional care settings limit timely access to services, even for eligible patients.



Legislative Solution

S. 1920 / H.R. 6592 (Tillis, Hassan, Rulli, Stanton) would modernize policy by:

-  **Establishing a Modern Service Definition**
Rename and redefine private duty nursing as Continuous Skilled Nursing (CSN) to better reflect the complexity and intensity of care provided.
-  **Removing Medicare CoPs**
Eliminate the automatic application of Medicare home health Conditions of Participation that are not suited for continuous skilled nursing services.
-  **Creating Service-Specific Standards**
Direct development of an updated regulatory framework tailored specifically to continuous skilled nursing care.
-  **Advancing Quality and Accountability**
Support creation of meaningful national quality measures focused on patient outcomes, transitions of care, and family experience.

Impact of Modernizing CSN Policy



Expands Access to Home-Based Care

Helps medically complex children and adults receive needed skilled nursing services safely at home.

Creates Smarter Federal Standards

Replaces outdated requirements with rules designed for continuous skilled nursing care.



Reduces Avoidable Healthcare Spending

Prevents costly hospital stays, emergency visits, and unnecessary institutional placements.



Strengthens Provider Capacity

Supports nurse recruitment, retention, and greater availability of services for families.

Support S.1920 / H.R.6592 to modernize outdated federal policy, improve access to home-based skilled nursing, and ensure medically complex patients can safely receive life-sustaining care at home.

