



## Who May Perform the Annual Wellness Visit?

**CMS's citation from the CMS.gov website is as follows:**

### **Who may perform the AWW?**

A health professional, meaning a physician (a doctor of medicine or osteopathy), a qualified non-physician practitioner (a physician assistant, nurse practitioner, or certified clinical nurse specialist), or a medical professional (including a health educator, registered dietitian, nutrition professional, or other licensed practitioner), or a team of such medical professionals who are working under the direct supervision of a physician, must furnish the AWW.

**Taken in context, CMS breaks down the clause into two distinct phrases:**

**[Phrase I]** A health professional, meaning a physician (a doctor of medicine or osteopathy), a qualified non-physician practitioner (a physician assistant, nurse practitioner, or certified clinical nurse specialist),

or

**[Phrase II]** a medical professional (including a health educator, registered dietitian, nutrition professional, or other licensed practitioner), or a team of such medical professionals who are working under the direct supervision of a physician, must furnish the AWW.

**Clearly Phrase I indicates a physician, DO, NPP, PA, FNP or CNS.**

The question comes in about CMS's interpretation of Phrase II, specifically, "what is a medical professional?" Further, what constitutes a "team of medical professionals"? When we queried CMS, we received the answer that:

*"...certainly a medical professional would include a health educator, licensed nurse, registered dietitian, certified medical assistant, nutritional professional or other medical practitioner who is licensed. Furthermore, a team of such medical professionals could include a nurse acting in tandem or jointly with a certified medical assistant and working together to perform the Annual Wellness Visit. In all cases, however, the medical professional or team of medical professionals must be supervised by a physician."*

WellTrackONE relies upon experts in the field of healthcare to provide "vetting" for any gray areas of CMS's interpretation. To that end, we can report that the Chief Compliance Officer of CareMore (division of WellPoint) has approved the use of CMAs in the Caremore offices for purposes of performing Annual Wellness Visits. It should be noted that Caremore strictly complies with the ruling to have the CMAs (medical professionals) supervised by physicians at all times. Additionally, Palmetto Primary Care Physicians in Charleston, SC also allows CMAs to perform their Annual Wellness Visits. We regard these circumstances as proof that "experts in the field" agree with our interpretation of the CMS guidelines that in fact, CMAs may perform Annual Wellness Visits under the supervision of physicians.

