



July 25, 2016

Secretary Robert A. McDonald  
Department of Veterans Affairs  
810 Vermont Avenue NW  
Room 1068  
Washington, DC 20420  
Attn: Director, Regulations Management (02REG)

Submitted electronically to [www.regulations.gov](http://www.regulations.gov)

Re: [Advanced Practice Registered Nurses](#) (RIN 2900–AP44)

Dear Secretary McDonald:

The Coalition for Patient's Rights (CPR) is pleased to comment in support of the Department of Veterans Affairs' proposed regulation on Advanced Practice Registered Nurses (APRNs).

The CPR is a national coalition of more than 30 organizations and, as such, represents more than three million licensed and certified healthcare professionals committed to ensuring comprehensive healthcare choices for all patients. Our coalition exists because of barriers our members face in providing the care they are trained and certified to deliver. While our member organizations include those representing APRNs, we also represent other health care professionals who provide patient-centered, team based care: psychologists, physical therapists, occupational therapists, audiologists and speech language pathologists, podiatrists, nutritionists, pharmacists and others.

CPR's large and diverse membership is devoted to tackling issues that help ensure patients have access to the care they need. We seek to educate policymakers, consumers and payers and work to advance the discussion around provider access and non-discrimination.

As such, we support the proposed regulation that would amend VA's medical regulations to permit full practice authority for all four APRN roles when they are acting within the scope of their VA employment and would authorize the use of APRNs to provide primary health care and other related health care services to the full extent of their education, training, and certification, without the clinical supervision or mandatory collaboration of physicians. The rule defines full practice authority as "the authority of an APRN to provide services . . . without the clinical oversight of a physician, regardless of State or local law restrictions, when that APRN is working within the scope of their VA employment." It would preempt conflicting state law with the exception of certain limitations imposed by the Controlled Substances Act (CSA), 21 U.S.C. 801 et seq.

**Veterans are best served when they have access to a team of healthcare professionals who work together to ensure overall health and wellness.**

The CPR is well aware of how a growing patient population needs access to a broad healthcare workforce, and the limited access and availability of care in rural areas. As is highlighted in the VA rule and the references to the Consensus Model for APRN Regulation, proper processes for licensing and certification are already in place. This rule would leverage those existing licensing and certification mechanisms to further access to care for veterans.

**Efforts to limit scope of practice are unnecessary and impede, rather than enhance, patient access to quality care.**

The overwhelming number of comments received on this rule is evidence that certain physician groups continue to fuel efforts to limit the scope of practice of many other health care providers. We applaud the VA for addressing scope of practice in this rule, underscoring that the services health care professionals are allowed to provide to patients are based on education, training and certification. Efforts to limit scope of practice run counter to evidence on quality and value and must be closely examined to determine whether they are a result of political pressure from groups opposed to direct patient access to a wide array of healthcare professionals and efforts to protect “market share.” Unwarranted regulatory obstacles, and in particular unnecessary requirements for physician supervision of other healthcare professionals, can lead to issues that harm both hands-on caregivers and supervising physicians.

**A growing patient population needs access to the full spectrum of professionals within the healthcare workforce and the implementation of the VA rule will have an impact beyond the VHA and with healthcare providers beyond APRNs.**

There is increased demand for healthcare by a growing patient population, fueled by the newly insured under the Affordable Care Act and by aging Baby Boomers. If we don’t effectively use the full spectrum of professionals within the health care workforce, patient needs can’t be met. State legislators and regulatory bodies will play close attention to the final rule. It is a common sense change, long overdue.

Sincerely,  
Coalition for Patients’ Rights

American Association of Nurse Anesthetists  
American College of Foot and Ankle Surgeons  
American Nurses Association  
American Occupational Therapy Association  
American Psychiatric Nurses Association  
American Psychological Association Practice Organization  
Association of periOperative Registered Nurses  
Board for Certification of Nutrition Specialists  
National Association of Pediatric Nurse Practitioners

For a full list of CPR members, please visit: <http://www.patientsrightscoalition.org/About-Us/Coalition-Members.aspx>