

VAU.S. Department
of Veterans AffairsDepartment of Veterans Affairs
Washington DC 20420

JUN 23 2014

Jesse S. Bushman, MA, MALA
Director of Advocacy and Government Affairs
American College of Nurse Midwives
8403 Colesville Road, Suite 1550
Silver Spring, MD 20910-6374

Dear Jesse Bushman:

Thank you for your letter regarding the proposed changes to the Veterans Health Administration (VHA) policy that would eliminate the requirement for Advanced Practice Registered Nurses (APRNs) to be supervised by a physician. I am happy to respond on behalf of the Department.

The Office of Nursing Services began the development of a VHA nursing handbook in 2009 to establish policy for the process of care delivery and the elements of practice for nursing. Within the nursing handbook, VHA is proposing the authorization of full practice authority (FPA) for APRNs without regard to their individual State Practice Acts, except for the dispensing, prescribing and administration of controlled substances. Under the Controlled Substances Act, 21 U.S.C. 801 et seq., and implementing regulations in 21 C.F.R. Part 1300, health care practitioners may dispense a controlled substance, including by prescribing and administering, only if they are authorized by their state license to do so and comply with the limitations and restrictions on that authority. This proposed change to nursing policy would increase access to care, decrease variability throughout the Department of Veterans Affairs (VA) system, and ensure continuity of the highest quality of care for all the Nation's Veterans. A significant number of states have approved FPA, with many VA medical centers successfully utilizing APRNs to the full extent of their education and training.

The 2010 Institute of Medicine (IOM) landmark report, "The Future of Nursing: Leading Change, Advancing Health", recommended removal of scope-of-practice barriers for APRNs which would authorize APRNs to practice to the full extent of their education, training and certification. There are four APRN roles as outlined by the APRN Consensus Model: Certified Nurse Practitioner (CNP), Clinical Nurse Specialist (CNS), Certified Registered Nurse Anesthetist (CRNA) and Certified Nurse Midwife (CNM). The VHA nursing handbook embraces the Consensus Model and the revised nursing handbook will specifically define the four APRN roles including CNMs. The information that was provided in your letter regarding the role of Certified Midwives is recognized however, the handbook will only address nursing roles. The IOM's recommendation prompted VHA to propose this policy. Thus, VHA's proposed nursing handbook is consistent with the IOM recommendation to remove scope-of-practice

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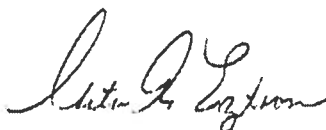
barriers including the variation in APRN practice that exists across VHA as a result of disparate state regulations. As an integrated Federal Health care System, the proposed policy parallels current policies in the Department of Defense and the Indian Health Service.

Since 1996, the VA health care benefits package has included maternity benefits. These benefits begin with the confirmation of pregnancy and continue through the postpartum visit or when the Veteran is medically released from obstetric care. On October 5, 2012, VHA issued the Maternity Health Care and Coordination Handbook 1330.03 which establishes procedures for providing and coordinating maternity care for pregnant women Veterans enrolled in the VA health care system. According to VHA Handbook 1330.03, Certified Nurse Midwives (CNMs) are qualified to provide routine obstetric care. Given the relatively small numbers of women Veterans receiving maternity benefits through VA, maternity care is typically provided through sharing agreements, contract care or Non-VA Purchased Care.

At present, the policy for APRN full FPA is under review. VHA is seeking input from external stakeholders through a variety of venues. The proposed policy will be published in the Federal Register for notice and comment.

If you need additional information, please contact Larry W. Rivers, Office of Nursing Services, at (202) 461-6964 or by email at Larry.Rivers@va.gov

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine Engstrom".

Christine Engstrom, PhD, CRNP, AOCN
Interim Chief Nursing Officer