



July 22, 2016

The Honorable Robert A. McDonald  
Secretary  
U.S. Department of Veterans Affairs  
810 Vermont Avenue NW  
Washington, DC 20420

Director, Regulations Management (02REG)  
U.S. Department of Veterans Affairs  
810 Vermont Avenue NW  
Room 1068  
Washington, DC 20420

RE: RIN 2900-AP44- Advanced Practice Registered Nurses (81 Fed.Reg. May 25, 2016)

Dear Secretary McDonald,

On behalf of the 61 undersigned national professional nursing organizations representing the Nursing Community coalition, we write to reiterate our steadfast support for the U.S. Department of Veterans Affairs (VA), Veterans Health Administration's (VHA) Proposed Rule (Federal Register Document Number 2016-12338, RIN 2900-AP44) published on May 25, 2016. As a coalition, our associations have advocated for Advanced Practice Registered Nurses (APRNs- including Nurse Practitioners, Certified Registered Nurse Anesthetists, Certified Nurse-Midwives, and Clinical Nurse Specialists) in VHA to practice to the full extent of their education and training since 2013. *We believe the Department has taken the necessary next step toward improving Veterans' access to safe, high-quality care by publishing this proposed rule, and we urge the VHA to move forward with its full implementation.*

Collectively, the Nursing Community represents over one million Registered Nurses and APRNs, nursing faculty, students, researchers, and nurse executives. Our associations advocate on a wide variety of issues to advance health and healthcare through the nursing profession. This proposal aligns with our overarching mission to promote America's health through nursing care. Specifically, this proposed rule would directly impact the practice of 6,100 APRNs who have dedicated their life's work to treating Veterans and their families and allow them to do so with great effectiveness and efficiency.

***Veterans’ Needs and the Evidence Should Dictate Practice Policies***

Health care in our country continues to progress toward models where the patient’s needs drive care delivery— not the other way around. The Veterans Health Administration is no exception. Veterans today have a host of healthcare needs that range across the entire spectrum of services. To address these needs, the VHA has and will continue to investigate solutions to ensure each and every Veteran has an individualized care plan with accompanying, appropriate services and providers.

The successful execution of this endeavor requires that all providers in the VHA—including APRNs— are utilized to their full potential. This will ensure greater access to care for Veterans by reducing unnecessary barriers that currently impede many Veterans from timely care or from seeking care within the VHA entirely. Implementing the proposed rule would provide all VHA sites the opportunity to expand access to care, and this would be of utmost importance in sites that struggle with provider recruitment and retention.

This proposed rule would align VHA policy with the wealth of evidence that shows APRNs provide safe, high-quality care. It would also align VHA policy with leading national authorities that have called upon the healthcare delivery system to remove barriers that prevent APRNs from practicing to their full scope.<sup>1,2,3</sup> This is further supported by the RAND Corporation Independent Assessment pursuant to the Veterans Access, Choice, and Accountability Act (P.L. 113-146) which recommends the VHA “formally grant Full Practice Authority for all advanced practice nurses...”<sup>4</sup>

It would be to the benefit of the VHA to modernize their policies so that Veterans have direct access to APRN services. This would cut down Veteran wait times, offer Veterans full access to this cadre of clinicians, and promote team-based practice with other health professionals. Additionally, this proposal, if implemented, would serve as a means to increase recruitment and retention of APRNs who are seeking employment in environments that would enable them to serve their patients to the top of their scope.

Again, we respectfully urge the VHA to implement this proposed rule. If you have any questions, please contact Convener of the Nursing Community, Dr. Suzanne Miyamoto, at [Smiyamoto@aacn.nche.edu](mailto:Smiyamoto@aacn.nche.edu).

Sincerely,

Academy of Medical-Surgical Nurses  
American Academy of Ambulatory Care Nursing  
American Academy of Nursing  
American Assembly for Men in Nursing  
American Association of Colleges of Nursing  
American Association of Critical-Care Nurses  
American Association of Heart Failure Nurses

American Association of Neuroscience Nurses  
American Association of Nurse Anesthetists  
American Association of Nurse Assessment Coordination  
American Association of Nurse Practitioners  
American Association of Occupational Health Nurses  
American College of Nurse-Midwives  
American Nephrology Nurses Association  
American Nurses Association  
American Organization of Nurse Executives  
American Pediatric Surgical Nurses Association  
American Psychiatric Nurses Association  
American Society for Pain Management Nursing  
American Society of PeriAnesthesia Nurses  
Association for Radiologic and Imaging Nursing  
Association of Community Health Nursing Educators  
Association of Nurses in AIDS Care  
Association of Pediatric Hematology/Oncology Nurses  
Association of periOperative Registered Nurses  
Association of Public Health Nurses  
Association of Rehabilitation Nurses  
Association of Veteran Affairs Nurse Anesthetists  
Association of Women's Health, Obstetric and Neonatal Nurses  
Commissioned Officers Association of the U.S. Public Health Service  
Dermatology Nurses' Association  
Emergency Nurses Association  
Gerontological Advanced Practice Nurses Association  
Hospice and Palliative Nurses Association  
Infusion Nurses Society  
International Association of Forensic Nurses  
International Society of Psychiatric-Mental Health Nurses  
National American Arab Nurses Association  
National Association of Clinical Nurse Specialists  
National Association of Hispanic Nurses  
National Association of Neonatal Nurse Practitioners  
National Association of Neonatal Nurses  
National Association of Nurse Practitioners in Women's Health  
National Association of Pediatric Nurse Practitioners  
National Association of School Nurses  
National Black Nurses Association  
National Council of State Boards of Nursing  
National Forum of State Nursing Workforce Centers  
National Gerontological Nursing Association  
National League for Nursing  
National Nurse-Led Centers Consortium

National Organization of Nurse Practitioner Faculties  
Nurses Organization of Veterans Affairs  
Oncology Nursing Society  
Organization for Associate Degree Nursing  
Pediatric Endocrinology Nursing Society  
Preventive Cardiovascular Nurses Association  
Public Health Nursing Section, American Public Health Association  
Society of Urologic Nurses and Associates  
The Quad Council of Public Health Nursing Organizations  
Wound, Ostomy and Continence Nurses Society

CC:

The Honorable David J. Shulkin, MD  
Under Secretary for Health

---

<sup>1</sup> Federal Trade Commission. (2014). *Policy Perspectives: Competition and the regulation of Advanced Practice Nurses*. Retrieved from: <https://www.ftc.gov/policy/policy-actions/advocacy-filings/2014/03/policy-perspectives-competition-regulation-advanced>.

<sup>2</sup> Institute of Medicine. (2010). *Future of Nursing: Leading Change, Advanced Health*. Retrieved from: <http://www.nationalacademies.org/hmd/Reports/2010/the-future-of-nursing-leading-change-advancing-health.aspx>.

<sup>3</sup> National Governors Association. (2012). *The role of nurse practitioners in meeting increased demand for primary care*. Retrieved from: <http://www.nga.org/cms/home/nga-center-for-best-practices/center-publications/page-health-publications/col2-content/main-content-list/the-role-of-nurse-practitioners.html>.

<sup>4</sup> RAND Corporation. (2015). *Assessment B (Health Care Capabilities) of the Independent Assessment of the Health Care Delivery System and Management Processes of the Department of Veterans Affairs*. Retrieved from: [http://www.va.gov/opa/choiceact/documents/assessments/integrated\\_report.pdf](http://www.va.gov/opa/choiceact/documents/assessments/integrated_report.pdf).