



July 13, 2016

David J. Shulkin, MD
Undersecretary for Health
Department of Veteran Affairs
810 Vermont Ave NW
Washington, DC 20420

Dear Dr. Shulkin:

On behalf of the American Academy of Family Physicians (AAFP), which represents 124,900 family physicians and medical students across the country, I am responding to the [proposed rule](#) titled “Advanced Practice Registered Nurses” as published by the Department of Veterans Affairs (VA) in the May 25, 2016 *Federal Register*.

Though the AAFP appreciates the opportunity to comment, we must express significant concerns with granting full practice authority for advanced practice registered nurses (APRNs) in the VA, without regard for state practice acts. This proposal would alter the consistent standards of care for veterans over non-veterans in the states; further fragment the health care system; and dismantle physician-led team-based health care models. The AAFP strongly opposes this unprecedented proposal to dismiss state practice authority via administrative rulemaking and to undermine physician-led team-based care models that have proven to be most effective in improving quality and efficiency.

The AAFP is particularly concerned with the VA’s willingness to supersede state laws and regulations regarding the authority of nurse practitioners. Fewer than half of the states across the nation have adopted full independent practice authority. The determination of a health professional’s ability to practice must follow appropriate standards as determined by state governments. It is clear that states are divided on this issue of independent authority and most do not believe it to be in the best interest of their citizens. States that have rejected these proposals have continuously cited concerns for patient safety. The AAFP strongly insists the VA respect these states’ concerns and we are troubled by the precedent the VA is making by changing a profession’s role and responsibility, especially when it is not a widely accepted practice. Allowing nurse practitioners to practice independently within VA facilities, when a state does not grant this authority, will lead to confusion by providers, patients, and health care systems. Having the VA overrule state laws will place veterans in an unfair position, receiving a different quality of care deemed unacceptable by state legislators for other civilians.

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As proposed, the rule specifically removes provisions that require APRNs to practice with collaborating physicians in patient-centered care teams that engage in diagnosis, treatment and patient care. The proposed rule is seeking to create essentially a national nursing license that will not be reciprocated consistently outside of the VA system. The proposed rule claims that having a national license will simplify the system; however, it will instead create an even more complex system causing confusion for providers and veterans. Physicians and APRNs who practice both in and out of the VA system will be following separate sets of rules.

The AAFP continues to consider the VA to be a leading and innovative health system in exploring the efficiencies of integrated care teams. Nonetheless, granting APRNs independent practice authority nationally would undermine a state's authority and dismantle the process of team-based collaborative care, while further fragmenting an already disjointed U.S. health care system. The AAFP believes that health professionals should work collaboratively as clinically integrated teams in the best interest of patients. Physician-led team-based care addresses patients' needs for high quality, accessible health care and reflects the skills, training and abilities of all the health care team members to the full extent of their state-based licenses. Furthermore, family physicians are particularly qualified to lead the health care team because they possess distinctive skills, training, experience and knowledge that allow them to provide comprehensive medical care, health maintenance, and preventative services for a range of biological and behavioral problems.

The AAFP recognizes that access to health care for veterans is a priority and limitations to that access should be removed wherever possible. There are a number of approaches for improvement the VA should pursue rather than this unprecedented rulemaking. For example, in a February 24, 2015 [letter](#), as a way to improve health care access for veterans, the AAFP urged the VA to initiate important policy adjustments to make it easier for non-VA medical practices to participate in the Veterans Choice Program. We continue to encourage the VA to identify and remove additional barriers that inhibit community-based physicians in treating their patients who are veterans.

Physicians and nurses occupy interdependent roles in the delivery of quality, comprehensive health care. The AAFP recognizes that nurses are an integral and valuable part of a physician-led team. However, we believe that independent practice authority within the VA health system is not the answer. Physicians offer an unmatched service to patients and, without their skills; patients' safety would be at risk. We can fill the need by having all health professionals on the team in the right roles.

We strongly urge the VA to respect state authority and support physician-led health care teams by rejecting the proposed rule. Thank you for the opportunity to comment. For any questions you might have, please contact Shannon Morey, State Government Relations Manager, at 202-232-9033 or smorey@aafp.org.

Sincerely,

A handwritten signature in black ink that reads "Robert L. Wergin MD". The signature is written in a cursive style with a large initial "R" and "W".

Robert L. Wergin, MD, FAAFP
Board Chair