

Dr. Shulkin  
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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](mailto:smorey@aafp.org).

Sincerely,

A handwritten signature in black ink that reads "Robert L. Wergin MD". The signature is written in a cursive, flowing style.

Robert L. Wergin, MD, FAAFP  
Board Chair