



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

June 20, 2013

The Honorable Eric K. Shinseki
Secretary of Veterans Affairs
810 Vermont Avenue NW
Washington, DC 20005

Re: Federal expansion of APRN license without rule-making

Dear Secretary Shinseki:

On behalf of the American Academy of Family Physicians (AAFP), which represents more than 110,600 family physicians and medical students nationwide, I write to express concern with a policy change the U.S. Department of Veterans Affairs (VA) reportedly intends to implement without seeking public comment should the VA publish a revised Nursing Policy & Practice handbook.

The AAFP recognizes that access to health care for veterans is a priority and limitations should be removed where possible. To that end, in a December 12, 2012 [letter](#), the AAFP enthusiastically supported the VA proposed rule that modified the Non-VA Care program as a way to improve health care access for veterans and allow the VA to better utilize resources. We continue to encourage the VA to identify and remove additional barriers that inhibit the way community-based physicians are able to treat their patients who also happen to be veterans.

However, we understand from officials in the VA Office of Nursing Services, the office intends to expand the role of nurse practitioners within the VA system. We appreciate and thank your staff for discussing this issue with us; however, the AAFP remains concerned that the public is not being given pertinent details since the VA apparently is not issuing a proposed rule. The AAFP continues to consider the VA as a leading and innovative health insurer exploring the efficiencies of integrated care teams. Thus, we are surprised to learn that VA outreach to stakeholders on the revisions within the handbook, which the VA began in 2010, has not included physicians, physician organizations or veteran patients.

Our limited understanding of this pending policy change is that the VA will provide all advanced practice registered nurses (APRN) a "full license" to practice regardless of laws in the state where the VA facility is located. APRNs would be subject to a privileging

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process that would determine their scope within the VA facility where they practice and that all APRNs would be required to maintain their national certification.

If our understanding is accurate, the AAFP considers this a major policy change that, perhaps well-intended, may have unforeseen consequences and thus we believe the issue is worthy of a normal public rulemaking process. Therefore, the AAFP strongly encourages the VA to promulgate a proposed rule on this topic and seek public feedback before publishing a revised Nursing Policy & Practice handbook.

The AAFP would like to know why the department is not soliciting public comment. If you have any questions or need any clarifications of this request, please contact Robert Bennett, AAFP Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org.

Sincerely,

A handwritten signature in black ink that reads "Glen Stream MD". The signature is written in a cursive, flowing style.

Glen Stream, MD, MBI, FAAFP
Board Chair

CC: Cathy Rick, RN, PhD (h), NEA-BC, FAAN, FACHE
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