



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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