



**American Hospital
Association®**

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July 22, 2016

Acting Secretary Sloan D. Gibson
Director, Regulations Management (02REG)
Department of Veterans Affairs
810 Vermont Avenue, NW, Room 1068
Washington, DC 20420

RE: RIN: 2900-AP44-Proposed Rule - Advanced Practice Registered Nurses (81 Fed. Reg.33155, May 25, 2016)

Dear Acting Secretary Gibson,

On behalf of our nearly 5,000 member hospitals, health systems and other health care organizations, and our 43,000 individual members, the American Hospital Association (AHA) fully supports the Department of Veterans Affairs' (VA) proposed rule that would allow all advanced practice nurses (APRNs) – nurse practitioners, certified registered nurse anesthetists, certified nurse midwives and clinical nurse specialists – to practice to the full extent of their education and training. This proposal is critical to ensuring that an adequate supply of quality licensed health providers is available to care for the more than 9 million veterans served annually by the VA system.

The AHA is proud that the 134 VA hospitals are members of the AHA. In addition, the AHA has been an active and engaged partner in the Veterans Choice Program, which enables veterans to access urgently needed care in their communities.

As you know, there are more than 6,000 APRNs serving in Veteran Health Administration care sites. APRNs receive extensive education and clinical training in their specific health fields. They are required to pass rigorous national certification board exams to demonstrate their expertise, knowledge and competency. Ninety-seven percent of APRNs have graduate degrees and 99 percent have attained national certification. APRNs bring a unique, comprehensive perspective to patient care, and they are highly-skilled collaborators in the delivery of team-based care. APRNs are recognized with full practice authority in 21 states.

Recognition of full practice authority for APRNs would bolster the VA's efforts to increase access to care by utilizing the skills and expertise of those APRNs currently working in the VA. The value and competence of APRNs has been recognized by the National Academy of Medicine (formerly known as the Institute of Medicine), the Federal Trade Commission, the



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National Governors Association, AARP, national veteran service organizations, and Fortune 500 corporations such as Walmart and CVS Health.

As the VA strives to provide timely, accessible and quality care for the millions of veterans, APRNs offer an important part of the solution if they are allowed to practice to the full scope of their education, training and experience.

Thank you for the opportunity to comment. If you need further information, please contact Veronika Riley at vriley@aha.org.

Sincerely,

/s/

Ashley Thompson
Senior Vice President
Public Policy Analysis and Development