



January 13, 2017

The Honorable Robert A. McDonald  
Secretary  
U.S. Department of Veterans Affairs  
810 Vermont Avenue NW  
Washington, DC 20420

Director, Regulations Management (02REG)  
U.S. Department of Veterans Affairs  
810 Vermont Avenue NW  
Room 1068  
Washington, DC 20420

RE: RIN 2900-AP44 Advanced Practice Registered Nurses (81 Fed. Reg. December 14, 2016)

Dear Secretary McDonald,

On behalf of the undersigned national professional nursing organizations representing the Nursing Community (APRNs) clinical practice within the Veterans Health Administration's (VHA).

As a coalition, our associations have advocated for APRNs (including Nurse Practitioners (NPs), Certified Registered Nurse Anesthetists (CRNAs), Certified Nurse Midwives (CNMs), and Clinical Nurse Specialists (CNSs)) in the VHA to practice to the full extent of their education and training since 2013. We applaud the rule that rightfully grants veterans direct access to three of the four roles (NPs, CNMs, and CNSs), but urge the department to include CRNAs as part of its full implementation.

Collectively, the Nursing Community represents over one million registered nurses, APRNs, nursing faculty, students, researchers, and nurse executives. Our associations advocate on a wide variety of issues to advance health and healthcare through the nursing profession. This rule supports our principal mission to promote American health through nursing care and will directly impact the practice of over 6,000 APRNs who have dedicated their lives to treating veterans and their families.

Health care in our country continues to progress toward patient-centered models of care where providers and appropriate coordinated services develop an individualized care plan to meet patients' needs. This rule helps achieve this end by allowing the VHA to manage its resources more prudently and fully employ the skills of health providers to the full extent of their education and training.

primary mission of the VHA which is to provide a complete medical and hospital service for the medical care and treatment of veterans (6/9/19). We firmly believe that this goal cannot be achieved if CRNAs are not included in the final rule.

The rule details that VHA sites will have the opportunity to expand access to care by removing barriers to APRN practice. We concur that this will be of t

Sincerely,

Academy of Medical-Surgical Nurses  
American Academy of Ambulatory Care Nursing  
American Academy of Nursing  
American Assembly for Men in Nursing  
American Association of Colleges of Nursing  
American Association of Critical Care Nurses  
American Association of Heart Failure Nurses  
American Association of Nurse Anesthetists  
American Association of Nurse Assessment Coordination  
American Association of Nurse Practitioners  
American Association of Occupational Health Nurses  
American College of Nurse-Midwives  
American Nephrology Nurses Association  
American Nurses Association  
American Nursing Informatics Association  
American Organization of Nurse Executives  
American Public Health Association Public Health Nursing Section  
American Psychiatric Nurses Association  
American Society for Pain Management Nursing  
American Society of PeriAnesthesia Nurses

Pediatric Endocrinology Nursing Society  
Preventative Cardiovascular Nurses Association  
Society of Pediatric Nurses