

March 19, 2018

Mr. Michael Shores
Director, Regulation Policy and Management (00REG)
U.S. Department of Veterans Affairs
810 Vermont Avenue NW
Room 1068
Washington, DC 20420

RE: RIN 2900-AP02– Civilian Health and Medical Program of the Department of Veterans Affairs (CHAMPVA) (83 Fed. Reg. 2396, January 17, 2018)

Dear Mr. Shores,

The American Association of Nurse Practitioners (AANP), representing the more than 234,000 nurse practitioners (NPs) in the United States, including more than 5,000¹ who serve our veterans in Veterans Health Administration (VHA) facilities. AANP appreciates the opportunity to provide comment in response to the CHAMPVA proposed rule (83 Fed. Reg. 2396, January 17, 2018).

NPs are advanced practice registered nurses who are prepared at the masters or doctoral level to provide primary, acute, chronic and specialty care to patients of all ages and walks of life. Daily practice includes: assessment; ordering, performing, supervising and interpreting diagnostic and laboratory tests; making diagnoses; initiating and managing treatment including prescribing medication and non-pharmacologic treatments; coordinating care; counseling; and educating patients and their families and communities. NPs practice in nearly every health care setting including clinics, hospitals, Veterans Affairs and Indian Health Care facilities, emergency rooms, urgent care sites, private physician or NP practices (both managed and owned by NPs), nursing homes, schools, colleges, retail clinics, public health departments, nurse managed clinics, homeless clinics, and home health. NPs hold prescriptive authority in all 50 states and the District of Columbia. It is important to note that 86.2% of NPs are certified in primary care, the majority of whom see Medicare and Medicaid patients as well as veterans and their families. NPs complete more than one billion patient visits annually.

We thank the Department of Veterans Affairs (VA) for issuing this proposed rule which would further align the CHAMPVA and Tricare programs. This will ease the administrative burden on the nurse practitioners and other clinicians that treat CHAMPVA and Tricare patients. We support the proposed clarifications of benefits coordination in the claims and appeals processes when the patient has other health insurance, as well as the proposal to remove the preauthorization requirement when the patient has other health insurance. We also agree with the VA's proposed definition of the term "authorized non-VA provider" which includes nurse practitioners. We encourage the VA to continue to adopt this language throughout the CHAMPVA regulations to increase consistency and ensure that all healthcare providers, including nurse practitioners, are authorized to provide treatment and services to CHAMPVA members to the full extent of their licensure and certification.

¹ 81 Fed. Reg. 90198, 90200. (Based on VHA payroll data from August 31, 2016 the VHA employees 5,444 NPs).

We thank you for the opportunity to comment on this proposed regulation. Should you have comments or questions, please direct them to MaryAnne Sapio, V.P. Federal Government Affairs, msapio@aanp.org, 703-740-2529.

Sincerely,

David Hebert
Chief Executive Officer