

November 1, 2017

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-AQ06 – Authority of Health Care Providers to Practice Telehealth (82 Fed. Reg. 45756, October 2, 2017)

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 Authority of Health Care Providers to Practice Telehealth proposed rule (82 Fed. Reg. 45756, October 2, 2017).

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 89.2% of NPs are certified in primary care, the majority of whom see Medicare and Medicaid patients. NPs complete more than one billion patient visits annually.

As providers of telehealth services, we are pleased that VHA is expanding its coverage through the authorization of the provision of telehealth services by telehealth providers within VHA. AANP supports removing restrictions on health care practice that limit access to safe care, and allowing VHA providers such as nurse practitioners to provide telehealth services to veterans to the full extent of their education and clinical training. The telehealth proposed rule is another step toward improving health care for veterans in a timely and accessible manner. It will allow NPs and other clinicians to provide both behavioral and general health care to veterans irrespective of location and would be particularly beneficial for veterans living in rural and underserved areas. Such an authorization is a critical step toward bridging gaps in health care access. We look forward to working with the VHA in implementing this rule as we continue to improve health care systems for our nation's veterans.

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