

June 11, 2018

Leroy A. Richardson, Chief  
Information Collection Review Office  
Centers for Disease Control and Prevention (CDC)  
1600 Clifton Road NE, MS-D74  
Atlanta, Georgia 30329

**Re: Proposed Data Collections Submitted for Public Comment (Docket No. CDC-2018-0030)**

Dear Chief Richardson,

The American Association of Nurse Practitioners (AANP), representing more than 248,000 nurse practitioners (NPs) in the United States, appreciates the opportunity to provide comment on the CDC's proposed data collections, specifically the Physician Application for Certification (2.12) for the Coal Workers' X-Ray Surveillance Program.

NPs are advanced practice registered nurses (APRNs) 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 86.6% 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.

Under current regulation, only physicians are authorized to complete the B Reader proficiency program and obtain certification as a B Reader to classify chest radiographs for the Coal Workers' X-ray Surveillance Program. Nurse practitioners order, perform, supervise and interpret diagnostic tests as part of their daily practice and should be authorized to complete the same training as their physician colleagues in order to be certified as B Readers and participate in all aspects of the surveillance program. Updating the regulations so that NPs are authorized to be certified as B Readers will expand the number of clinicians eligible for the program, enhancing the ability of the program to diagnose coal workers' pneumoconiosis in its early stages.

Recently, the Coal Workers' X-Ray Surveillance Program identified 416 cases of progressive massive fibrosis or complicated lung disease in central Appalachia between 2013-2017 which was described as the "largest cluster of progressive massive fibrosis ever reported in the scientific literature"<sup>1</sup> related to Black Lung Disease. We have previously commented to the Department of Labor that authorizing nurse

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<sup>1</sup> <https://www.npr.org/2018/02/06/583456129/black-lung-study-biggest-cluster-ever-of-fatal-coal-miners-disease>.

practitioners to participate in the Black Lung Program to their full scope of practice will increase the quantity of high-quality providers available to treat these patients and assist them in receiving the care for which they are entitled. We would also appreciate the support of the CDC in encouraging the Department of Labor to include NPs in the class of clinician authorized to diagnose, treat and certify the presence of pneumoconiosis for the Black Lung Disease Program, as well as complete any applicable paperwork on behalf of their patients suffering from Black Lung Disease.

We thank you for the opportunity to comment on this proposed information collection. We look forward to working with the CDC on diagnosing, treating and preventing pneumoconiosis in coal miners. Should you have comments or questions, please direct them to MaryAnne Sapio, V.P. Federal Government Affairs, [msapio@aanp.org](mailto:msapio@aanp.org), 703-740-2529.

Sincerely,

A handwritten signature in cursive script that reads "David E. Hebert". The signature is written in black ink and includes a long horizontal flourish extending to the right.

David Hebert  
Chief Executive Officer