

Secretary Robert A. McDonald
US Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420-0001

Dear Secretary McDonald,

The Maryland Academy of Advanced Practice Clinicians (MAAPC) represents the advanced practice nurses in Maryland; we are writing to express our support for the proposed rule [RIN: 2900-AP44 - Proposed Rule - Advanced Practice Registered Nurses (81 Fed. Reg. 33155, May 25, 2016)].

Our veterans need and deserve adequate access to care and the APRNs who work for the VA are fully capable of assisting in accomplishing this goal.

As you know, over 6,000 APRNs, of which over 4,000 are NPs, currently provide a full range of services to our veterans in the VHA. The safety of APRN services has long been recognized by the VHA and underscored by peer-reviewed scientific studies. These studies have consistently proven that the care provided by APRNs, practicing to the full scope of their education and preparation is equal to the care of their physician counterparts. This large and ever growing body of evidence has led the National Academy of Medicine (formerly the Institute of Medicine), AARP, the Robert Wood Johnson Foundation, the National Governors Association, and the Federal Trade Commission to encourage providing patients direct access to APRNs.

A majority of states, the Department of Defense and the Indian Health Service currently allow CNMs to practice without a requirement for clinical oversight by a physician, just as the VA has proposed to do. The VA's proposal is therefore very much in line with common practice throughout the country.

Limiting APRN practice within the VHA impairs access to care, risks lengthening delays in health care delivery, increases healthcare costs, and fails to promote patient safety. This is why we, along with the APRNs of Maryland, urge you to move forward with this proposed rule. By finalizing and implementing this rule we will be ensuring that our veterans receive timely, high quality health care.

We invite you to contact MAAPC, if you would like to engage in dialogue about this topic; we would be more than glad to have discussions based on our experiences in developing Maryland into a state with full practice authority.

We have created a virtual petition so you can see the support this proposed rule has in Maryland.

Sincerely,

MAAPC's Board of Directors

www.maapconline.org

themaapc@gmail.com