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Office of the President and CEO

July 7, 2016

The Honorable Robert A. McDonald
Secretary U.S. Department of Veterans Affairs
810 Vermont Ave. NW, Room 1068
Washington, D.C. 20420

RE: Comments in response to AP44-Advanced Practice Registered Nurses

Dear Mr. Secretary:

The Robert Wood Johnson Foundation (RWJF) is pleased to have the opportunity to comment on the U.S. Department of Veterans Affairs (VA) proposed rule to allow full practice authority for all four categories of advanced practice registered nurses (APRNs). This proposed change would provide our nation's veterans with what they so richly deserve—greater access to excellent health care. This is why RWJF strongly supports the proposed rule.

RWJF is the nation's largest philanthropy dedicated to improving health and health care in the United States. We are committed to building a Culture of Health where everyone—no matter where they live, the color of their skin, or their financial situation—has the opportunity to lead a healthy, productive life. Access to comprehensive, high-quality health services when needed is essential to our vision.

We are pleased to see that VA cites the findings of the Institute of Medicine's *The Future of Nursing: Leading Change, Advancing Health* report as evidence for the proposal. RWJF supported the development and distribution of that report, and we note that the proposed rule reflects its first recommendation: to remove barriers that prohibit APRNs from practicing to the full extent of their education and training and fully using their skills to meet health care needs in their communities.¹ This recommendation is backed by many years' worth of evidence.

Reducing barriers to full practice authority for APRNs also will improve access to care for those who have given so much to this country and allow a better balance between prevention and acute and chronic care services. VA has served as a national role model

for exceptional, team-based care, and we are confident that this policy is in keeping with this tradition. Also, the Department's proposal to provide veterans greater access to VA health care by expanding the pool of qualified health care professionals who are authorized to provide primary health care and other health care services will bring VA policies in line with those of the U.S. Department of Defense, the Indian Health Service, and the U.S. Public Health Service.

VA's proposed rule also calls for the integration of public health, social service, and health care systems, which is vital to building a Culture of Health in our nation. When these systems work in sync, we will see an improvement in the efficiency and quality of care delivered. Should the proposed rule take effect, more veterans will get the preventive and social services they need early and avoid unnecessary medical care.

Finally, the independent assessment created under Section 201 of the Veterans Access, Choice, and Accountability Act of 2014 provides additional reasons this proposal should prevail. It states that among the "significant steps" VA should take to improve access to care in the face of expected increases in demand "are formalizing full nursing practice authority."²

Again, RWJF appreciates the opportunity to comment on this important proposed rule, which would permit VA to use its health care resources more effectively and in a manner consistent with the role of APRNs in the non-VA healthcare facilities, while maintaining the patient-centered, safe, high-quality health care that veterans receive from VA. The rule would help meet the health care needs of veterans, their families, and all Americans now and into the future. RWJF applauds VA for its vision to enhance health care for our nation's veterans.

Risa Lavizzo-Mourey, MD, MBA



President and CEO
Robert Wood Johnson Foundation

¹ The Institute of Medicine, 2011. *The Future of Nursing: Leading Change, Advancing Health*. Committee on the Robert Wood Johnson Foundation Initiative on the Future of Nursing, at the Institute of Medicine; Institute of Medicine. nationalacademies.org/hmd/Reports/2010/The-Future-of-Nursing-Leading-Change-Advancing-Health.aspx

² Prepared for U.S. Department of Veterans Affairs, 2015. *Independent Assessment of the Health Care Delivery Systems and Management Processes of the Department of Veterans Affairs*. Appendix B, Health Care Capabilities. va.gov/opa/choiceact/documents/assessments/Integrated_Report.pdf