



October 13, 2023

Denis R. McDonough  
Secretary  
U.S. Department of Veterans Affairs  
810 Vermont Avenue, NW  
Washington, DC 20420

RE: RIN 2900-AR98 — Proposed Rule-VA Health Professional Scholarship Program

Dear Secretary McDonough:

On behalf of more than 168,000 PAs (physician associates/physician assistants) throughout the United States and the more than 2,800 PAs employed full-time by the U.S. Department of Veterans Affairs (VA), the American Academy of PAs (AAPA) thanks the VA for its commitment to our nation's veterans. AAPA appreciates the opportunity to submit comments on the proposed rule to amend regulations that govern the VA Health Professional Scholarship Program (HPSP.) AAPA supports implementation of the mandates in the Consolidated Appropriations Act, which would expand the number of scholarships available to those who are pursuing degrees or training in mental health disciplines. PAs, as active members of a healthcare team, routinely treat patients with complex diagnoses or multiple comorbidities, including the unique healthcare situations that impact the nation's military and veteran populations.

PAs are highly-trained medical professionals who diagnose illness, develop and manage treatment plans, prescribe medications, and are often a patient's primary healthcare provider. PAs, with thousands of hours of medical education and training, practice in all medical and surgical specialties in all 50 states, the District of Columbia, U.S. territories, and in the uniformed services. Additionally, PAs are one of three healthcare professions, including physicians and advanced practice registered nurses, recognized in Medicare to provide both primary and mental health medical care in the United States. PAs routinely furnish outpatient diagnosis and treatment of mental disorders for Medicare beneficiaries as front-line providers and witness the mental health challenges their patients face daily.

The PA profession proudly maintains a close connection to the VA, as the founding class of PA students in 1965 were veterans. These first PA students were former Navy hospital corpsmen and Army combat medics who returned from the Vietnam war with considerable medical training from their military service. The VA was the first employer of PAs in 1967 and today is the largest single

employer of PAs in the nation. Eleven percent of all practicing PAs and 24 percent of PAs employed by the VA are veterans, active-duty military, or serve in the National Guard and Reserves. PAs maintain a strong, personal desire and dedication to serve veterans and AAPA fully supports efforts, like legislation in 2018 that provided funding for HPSP scholarships for PAs, to strengthen the workforce at the VA and expand access to care for veterans. AAPA continues to support efforts that encourage and support PAs to practice in mental or behavioral health and psychiatry to help address national provider shortages.

Currently, 2.3 percent of PAs practice in psychiatry and mental health. These PAs are on the front lines working to address the growing demand for psychiatric and behavioral health services. PAs practicing in psychiatry provide a broad range of services to patients, including but not limited to prescribing medications for acute and chronic illness, counseling and educating patients and families, diagnosing, treating, and managing acute illness, performing physical exams and obtaining medical histories, providing care coordination, and ordering/performing/interpreting diagnostic tests. PAs in psychiatry care for patients with a wide range of conditions such as mood, anxiety, and obsessive-compulsive disorders and substance related and addictive disorders. Most also treat patients with personality, sleep, cognitive, and attention disorders.

As the VA and Congress work to strengthen the mental and behavioral health workforce within the VA, it is essential that PAs are included in these efforts. In 2018, the PA Foundation launched an inaugural *Mental Health Outreach Fellowship*.<sup>1</sup> This profession-driven initiative was the first phase of a wider mental health outreach effort that sought to more strongly connect PAs with community mental health needs.<sup>2</sup> In 2019, the first PA fellows reported training more than 1,500 people across the United States to recognize and respond to mental health needs in their communities. With clinical expertise, medical training, the initiative to help, and unique connection to our veteran population, PAs are on the ground in local communities and especially positioned to increase access to mental and behavioral healthcare. Also, during this timeframe, the VA made significant progress in supporting postgraduate PA mental health residencies that help PAs develop skills, knowledge, and attitudes that promote high-quality and competent mental health care.<sup>3</sup>

AAPA recommends that the VA implement the following changes to ensure PAs are supported and empowered to practice in behavioral and mental healthcare and psychiatry:

### **Fully Include PAs in the Text of the Regulation as a Profession Eligible for HPSP Scholarships**

In the proposal published in the *Federal Register*, the VA proposes specifically listing “*the examples Congress included in the law*” of behavioral disciplines in 38 CFR part 17, § 17.603. The narrative in

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<sup>1</sup> <https://pa-foundation.org/mental-health-outreach-reflecting-and-forging-ahead/>

<sup>2</sup> <https://pa-foundation.org/our-programs/mental-health-outreach-fellowship/>

<sup>3</sup> <https://www.va.gov/chillicothe-health-care/work-with-us/internships-and-fellowships/postgraduate-physician-assistant-mental-health-residency-program/>

the Federal Register also makes note that “*other mental health disciplines may include licensed professional mental health counselor, marriage and family therapist, physician assistants, and rehabilitation counseling.*” AAPA appreciates the VA specifying in the proposal that PAs should be eligible for the additional HPSP scholarships. AAPA also formally requests that the VA specifically list PAs in the Code of Federal Regulations as well to minimize any future confusion.

### **Modernize other VHA Documents to Recognize PAs and Mental Health Providers**

AAPA appreciates the important steps the VA has taken in recent years to create much-needed postgraduate PA mental health residencies. While the VA is demonstrating needed progress to recruit, retain, and train PAs to provide mental health services, challenges remain. Ambiguity in VA policies causes unnecessary confusion and prevents highly qualified PAs from filling critical positions in mental or behavioral health.

For instance, *VHA Directive 1165 (Leadership Positions in Mental Health)*, excludes PAs from definition of a core mental health discipline, while section 5.h.(1)(b) states that mental health leadership positions can be posted for other professions including physician assistants. As a result of PAs not being explicitly listed as a core profession in the directive, PAs, though highly qualified, are routinely excluded from position descriptions and job postings. AAPA requests that the VA update VHA Directive 1165 to include PAs as a core mental health discipline and update other policies that may omit PAs from being listed as qualified mental health providers.

In conclusion, AAPA appreciates the VA clarifying in the proposed rule that PAs are eligible for the newly created HPSP scholarships, and we ask that PAs are codified in the text of the regulation as being eligible for such scholarships. AAPA appreciated the work by the VA to strengthen access to mental health services for veterans and we strongly urge the VA to support and put forward policies that fully utilize the skills of PAs as it continues this work. Should you have any questions or require additional information, please do not hesitate to contact Tate Heuer, AAPA Vice President, Federal Advocacy, at 571-319-4338 or at [theuer@aapa.org](mailto:theuer@aapa.org).

Sincerely,



Lisa M. Gables, CPA  
Chief Executive Officer