



December 19, 2017

Mick Mulvaney
Director
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Director Mulvaney,

On behalf of the more than 115,000 PAs (physician assistants) throughout the United States, and the more than 2,200 PAs currently employed full-time by the U.S. Department of Veterans Affairs (VA), the American Academy of PAs (AAPA) would like to respectfully request that any proposals included in the President's FY 2019 Budget related to the VA ensure the PA workforce is fully utilized to help reduce the backlog in providing care to veterans. We also write to raise concerns related to policy proposals recently transmitted from the VA to the Senate Committee on Veterans' Affairs that exclude PAs from incentives and advancement opportunities that could make it more difficult for the VA to recruit and retain PAs in order to fulfill its mission.

The Office of Management and Budget (OMB) and its professional staff enjoy tremendous respect for their role in offering comprehensive and strategic insight to federal agencies to ensure that policy proposals meet the broader goals of the administration and the American public. AAPA looks forward to working with you and the OMB to ensure the needs of veterans and the overall needs of the VA workforce are taken into consideration when policy is developed by the VA. As workforce proposals are vetted by OMB, it is vital to include PAs to ensure a thriving workforce that best serves our veterans.

Background

Timely access to quality patient care is one of the most critical issues facing our nation's veterans. AAPA believes PAs are a key part of any plan for increasing access to quality medical care at VA medical facilities. PAs provide high quality, cost-effective medical care in virtually all health settings and in every medical and surgical specialty. The rigorous education and clinical training of PAs enables them to be fully qualified and prepared to manage the treatment of patients who present with physical and/or mental illnesses. PAs are educated to seamlessly work in a healthcare team, and they manage the full scope of patient care often handling patients with complex diagnoses or multiple comorbidities, situations which commonly occur within the nation's veteran population. PAs are front line healthcare providers, and are frequently the main provider for their patients at VA medical facilities.

The PA profession has long been connected and committed to veterans and veterans' healthcare. The first PA students were Navy Corpsmen who served in the Vietnam War; and recruitment of and support for veterans in PA educational programs continues to this day. As of 2014, nearly 12% of all PAs are

veterans, active duty or retired military, or in the National Guard and Reserves, and more than 2,200 PAs are currently employed full-time by the VA.

PAs are currently classified by the VA Office of Inspector General as a critical occupation facing significant staffing shortages in the VA system. The 2015 Veterans Health Administration (VHA) Workforce Planning Report identified PAs as having “one of the highest administrative quit rates, retirement rates and total loss rates of any of the mission critical occupations” within the VHA. The reasons for this discouraging loss in the face of such great need by our veterans are preventable and fixable. By fully considering and integrating PAs in to the workforce and VA policy proposals, we can work together to improve care access and outcomes for our veterans.

Legislative Proposals Impacting PAs

The President’s FY18 budget proposal included a provision that would allow for the reimbursement of up to \$1,000 for continuing professional education (CPE) expenses for advanced practice registered nurses (APRNs) serving at the VA. This provision was not included in the final budget approved by Congress, but it serves as an example of a proposal that should have been extended to PAs. In the face of the need to stem the high attrition rate of PAs serving at the VA, we need to avoid proposals such as this, which will exacerbate rather than solve the access issues facing veterans at the VA.

PAs are advanced practice providers that perform and compete with nurse practitioners (NPs) for many of the same jobs at the VA. Just as NPs must complete CPE requirements, PAs must complete 100 hours of continuing medical education (CME) every two years to maintain their certification, a requirement for VA employment. To allow for the reimbursement of continuing education expenses for one profession and not the other creates an inequity. There is no medical or policy justification for providing this benefit for one profession and not the other.

Currently, AAPA is also very concerned about the exclusion of PAs from key provisions in the Caring for our Veterans Act of 2017, as recently passed by the Senate Committee on Veterans’ Affairs. This legislation would undermine the important role PAs have historically played as advanced practice providers for our nation’s veterans at the VA.

Specifically, PAs are omitted from two key sections in the Caring for our Veterans Act of 2017:

Sec. 213. Reimbursement of continuing professional education (CPE) requirements for board certified advanced practice registered nurses. As currently written, this section would reimburse CPE requirements for advanced practice registered nurses (APRNs), but it would not apply to PAs.

Sec. 224. Modification of pay cap for nurses. As currently written, this section would raise the pay cap for nurses in the VA from Schedule IV to Schedule III, but not do the same for PAs.

In addition to the continuing education funding request for APRNs, this proposal raises the salary cap for the entire nursing profession. Advancing this proposal without including PAs would be in direct contradiction to the spirit and effect of Section 212 of the VA Choice and Quality Employment Act of 2017 (Public Law 115-46) recently passed by Congress and signed by the President. This law ensures competitive pay for PAs at the Department of Veterans Affairs (VA) by taking into consideration private

sector PA salaries in local markets when establishing compensation for PAs at VA facilities, and put PAs on the same pay schedule as their nursing counterparts.

If PAs are excluded from incentives offered to APRNs – many of whom serve in the same positions as PAs – it will only become harder for the VA to employ the nation’s PA workforce. It also sends a discouraging message to those PAs who are veterans themselves, who have dedicated their careers to serving those who serve. Not allowing PAs to have the same recruitment incentives and retention benefits as their similarly situated advanced nursing colleagues will further erode the VA’s PA workforce, which we do not believe is the intent of the proposals or of the VA. We encourage OMB to instead adopt policies that strengthen the VA workforce by including PAs in this proposal and future proposals to improve workforce policies at the VA.

AAPA is currently working with the committee, and we respectfully request assistance from OMB and the VA in working with Congress to revise the proposal before final passage to include PAs in this legislation.

To strengthen veterans’ access to quality care at the VA, AAPA requests assistance to:

- 1) Include PAs in the reimbursement for continuing education expenses and salary cap proposals if they are contemplated in the President’s FY19 budget request, and other workforce development proposals going forward.
- 2) Work to help correct the provisions in the Caring for our Veterans Act that would create inequities for the more than 2,200 PAs currently working at the VA and form a barrier to PA recruitment and retention, which is desperately needed to combat the VA’s provider shortage.

AAPA stands ready to assist the OMB in meeting its challenge to provide veterans with timely access to high quality medical care. Should you have any questions or require additional information, please do not hesitate to reach out to Tate Heuer, AAPA Vice President, Federal Advocacy, at 571-319-4338 or at theuer@aapa.org.

Thank you for your assistance. We look forward to meeting with you soon and continuing to work with you on these important issues.

Sincerely,



Jennifer L. Dorn
Chief Executive Officer