



January 11, 2021

Beth Taylor
Chief Nursing Officer
Veterans Health Administration
810 Vermont Avenue, NW
Washington, DC 20420

RE: RIN 2900-AQ94—Authority of VA Professionals to Practice Health Care

On behalf of more than 140,000 PAs (physician assistants) throughout the United States and more than 2,600 PAs currently employed full-time by the U.S. Department of Veterans Affairs (VA), the American Academy of PAs (AAPA) appreciates the opportunity to submit comments in support of the VA's recently published interim final rule affirming that healthcare providers may practice in a manner consistent with the scope and requirements of their VA employment, notwithstanding any state license, registration, certification, or other requirements that unduly interfere with their practice.

AAPA strongly supports the interim final rule, as it confirms and clearly states the authority of the VA to authorize healthcare professionals, including PAs, to practice to the full extent of their education, training, and experience in a manner that standardizes a health profession's practice in all VA medical facilities. AAPA strongly encourages the VA to utilize its authority established in this rule to grant full practice authority to the PA profession at the VA to ensure its PA workforce is in the strongest position to continue serving veterans and to expand access to high quality care for our nation's veterans.

This interim final rule is fully consistent with the sentiments expressed by VA Secretary Robert Wilkie in a recent letter to Congress, stating that the "VA fully supports the idea of giving PAs full practice authority that would enable Veterans Health Administration PAs to practice medicine as licensed independent practitioners." That same letter also noted that granting such status to PAs would "increase Veterans' access to care," as well as decrease burdens across the VA enterprise resulting from PAs not having full practice authority.

This interim final rule makes explicit that the VA has the needed regulatory authority to establish policies that will maximize the Agency's ability to better utilize the education, training, and skill sets of all the health professionals it employs.

It is a significant advancement to state in regulation, as this rule does, that VA healthcare professionals, including PAs, can practice their healthcare profession consistent with the scope and requirements of their VA employment under policies adopted by the VA, notwithstanding any state license, registration, certification, or other requirements that could unduly interfere with such practice.

PAs in the VA

PAs represent a highly educated and experienced VA workforce that provides the comprehensive care veterans desperately need across a wide range of clinical settings and specialties. The VA is currently the single largest employer of PAs in the U.S., employing over 2,600 PAs. These PAs often serve as the first point of contact for patients at the VA and are tasked with providing them efficient and high-quality care. The PA profession has long been connected and committed to veterans and veterans' healthcare. The first PA students previously served as Navy Corpsmen. Additionally, many of the PAs who are employed by the VA are themselves veterans and have a strong desire to serve veterans.

Prior to the release of this interim final rule, PAs at the VA have practiced for decades under federally established guidelines. The current PA utilization directive, which was issued in 2013, makes clear that "states are prohibited from regulating or controlling the activities of the federal government without written Congressional consent; where federal and state laws conflict, federal law governs official actions of Federal employees." The directive also states that "examples of the types of activities that the federal government may establish are qualifications for employment and scopes of practice." This rule will further reinforce this directive regarding the provision of telehealth services by VA PAs.

Conclusion

AAPA continues to strongly encourage the VA to remove barriers that may restrict the ability of providers, such as PAs, to practice to the level of their education and experience. This interim final rule is a positive step in clarifying the authority of the VA to remove barriers preventing healthcare providers at the VA from being fully utilized to provide high-quality and efficient healthcare services to our nation's veterans.

AAPA strongly supports the released interim final rule confirming that VA healthcare professionals may practice in a manner consistent with the scope and requirements of their VA employment, and continues to stand ready to assist the VA 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 contact Tate Heuer, AAPA Vice President, Federal Advocacy, at 571-319-4338 or at theuer@aapa.org.

Sincerely,

A handwritten signature in black ink that reads "Lisa M. Gables". The signature is written in a cursive, flowing style.

Lisa M. Gables, CPA
Chief Executive Officer