



January 11, 2017

The Honorable Robert A. McDonald  
Secretary  
U.S. Department of Veterans Affairs  
810 Vermont Avenue NW  
Washington, DC 20420

Director, Regulations Management (02REG)  
U.S. Department of Veterans Affairs  
810 Vermont Avenue NW  
Room 1068  
Washington, DC 20420

RE: RIN 2900-AP44- Advanced Practice Registered Nurses (81 Fed. Reg. December 14, 2016)

Dear Secretary McDonald,

On behalf of the American Psychiatric Nurses Association (APNA), I wish to both express appreciation and urge further action for the final rule published by the U.S. Department of Veterans Affairs (VA) on December 14, 2016 (Federal Register Document Number 2016-12338, RIN 2900-AP44) regarding Advanced Practice Registered Nurses' (APRNs) clinical practice within the Veterans Health Administration's (VHA). APNA has long advocated for APRNs (Nurse Practitioners (NPs), Certified Registered Nurse Anesthetists (CRNAs), Certified Nurse-Midwives (CNMs), and Clinical Nurse Specialists (CNSs)) in the VHA to practice to the full extent of their education, training, and certification. We applaud the ruling that allows Veterans direct access to three of those four roles (NPs, CNMs, and CNSs), but urge the department to include CRNAs as part of its full implementation.

The American Psychiatric Nurses Association represents psychiatric-mental health nurses at both the RN and advanced practice levels. Many of our members work within the Veterans Health Administration on the front lines to support the mental health needs of our veterans and their families. APNA as an organization, through its participation in the White House's Joining Forces initiative, has made a priority of supporting this population's mental health needs. This rule supports our mission to promote mental health and wellbeing through nursing care and will directly impact the practice of more than 6,000 APRNs, both within the specialty of psychiatric-mental health and without, who have dedicated their careers to treating Veterans and their families.

We are grateful for the foresight of your leadership in ushering this rule into action. Removing burdensome regulations and allowing NPs, CNMs, and CNSs to practice to the fullest extent of

their education, training, and certification, will support the primary mission of VHA to “provide a complete medical and hospital service for the medical care and treatment of veterans”. However, we are confident that meaningful expansion of access to care for our Veterans cannot be fully achieved without the inclusion of CRNAs in this final rule.

APNA stands behind the Nursing Community, a coalition of national professional nursing organizations, and takes the position that:

- CRNAs are a critical link for providing care to Veterans in rural and underserved communities.
- In the context of an opioid use epidemic which affects our entire population, including veterans, CRNAs offer care that is gravely needed: Their training and qualifications include holistic multi-modal approaches to chronic pain management, including interventional pain management.
- A streamlined approach to APRN scope of practice must be inclusive of all four APRN roles in order for the implementation of this final rule to fully effect standardization and consistency. Such standardization would in turn allow for more efficient use of APRN staff and thereby increase VHA capacity for timely, safe, efficient, and effective delivery of care.

Thank you for the opportunity to comment and for your continued work to support our nation’s veterans and their families.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas Croce Jr.", with a stylized flourish at the end.

Nicholas Croce Jr., MS  
Executive Director