



January 11, 2021

Dr. Beth Taylor  
Department of Veterans Affairs  
10A1 810 Vermont Avenue NW  
Washington, DC 20420

**Re: Comments on RIN 2900-AQ94—Authority of VA Professionals to Practice Health Care**

Dear Dr. Beth Taylor,

On behalf of the undersigned organizations representing the Patient Access to Responsible Care Alliance (PARCA), we are writing today to comment on the Department of Veterans Affairs (VA) “Interim Final Rule – Authority of VA Professionals to Practice Health Care” issued on November 11, 2020 (RIN: 2900-AQ94). We support the agency’s efforts to ensure access to care, both during the national pandemic and in the future. We recognize the importance of VA’s supremacy and allowing VA healthcare providers to practice across state lines, in both in-person and telehealth settings. We also support removing unnecessary barriers to practice, to allow providers to practice to the full extent of their education and training, as the VA has already done for nurse practitioners, clinical nurse specialists and certified nurse-midwives.

As member organizations of PARCA, we represent non-MD/DO Medicare recognized health and mental providers who provide high-quality, evidence-based care to millions of Americans, especially to those living in rural and underserved areas. As the provider of choice for many patients, we understand the importance of ensuring providers are recognized to practice to the full extent of their training, education, certification, and experience as a way to increase access and competition, lower costs and maintain quality and safety. Collectively, PARCA member organizations represent over 4 million providers throughout the nation, with expertise in a wide variety of areas

As mentioned in the Interim Final rule, it is vital to allow the VA to ensure that providers are practicing to the full extent of their education and training in order to create a coherent and streamlined national system for the VA and DoD, as they work to integrate their Electronic Health Record (EHR) systems. Additionally, allowing providers to practice to the full extent of their education and training will help to limit the disruption and minimize any decrease of access that would come with unnecessarily limiting a provider’s practice and patient access.



We have seen throughout the COVID-19 pandemic, movements to remove unnecessary barriers to care that impede a providers' ability to deliver care. At the federal, state, and local levels we have seen increased movement to allow providers to practice to the full extent of their education and training, and we believe these efforts should continue after the pandemic has ended. VA Directive 1899, issued at the outset of the health emergency was an important step towards increasing access to care for our nation's veterans, and we encourage the VA to continue down that route.

We support the VA's movement in this Interim Final Rule to ensure that healthcare providers working within the VA are not unnecessarily hamstrung by overly restrictive state regulations, and are authorized to practice to the full extent of their education and training, regardless of location, when working within the VA. We believe this will increase access to care, lower costs and wait times and maintain the highest levels of safety. We hope to work with the VA to establish safe, responsible, and appropriate practice standards for VA providers.

If we can be of any assistance to you or your staff, please do not hesitate to contact any of the organizations individually, or Matthew Thackston, Chair of PARCA at [mthackston@aanadc.com](mailto:mthackston@aanadc.com). We hope to work with you in the coming months to ensure that all veterans have access to care from the provider of their choice without undue burden. Thank you for your time and consideration.

Sincerely,

American Academy of PAs  
American Association of Nurse Anesthetists  
American Association of Nurse Practitioners  
American Chiropractic Association  
American College of Nurse-Midwives  
American Occupational Therapy Association  
American Optometric Association  
American Physical Therapy Association  
American Psychological Association  
National Association of Pediatric Nurse Practitioners  
National Association of Social Workers  
National League for Nursing