



November 1, 2017

Mr. Michael Shores
Director, Regulations Management (02REG)
U.S. Department of Veterans Affairs
810 Vermont Avenue NW
Room 1063B
Washington, DC 20420

RE: RIN 2900-AQ06-Authority of Health Care Providers to Practice Telehealth Proposed Rule (82 Fed. Reg. 45756, October 2, 2017)

Dear Mr. Shores,

On behalf of the 41 undersigned organizations representing the Nursing Community Coalition, we write to provide comments on the proposed rule published by the U.S. Department of Veterans Affairs (VA) on October 2, 2017 (RIN 2900-AQ06-Authority of Health Care Providers to Practice Telehealth). We appreciate the forward movement the VA is taking to consider optimal ways of increasing access to quality health care for our nation's veterans.

The members of the Nursing Community Coalition are the cross section of education, practice, research, and regulation within the nursing profession. With over four million licensed Registered Nurses (RNs), Advanced Practice Registered Nurses (APRNs), and nursing students, the profession embodies the drive and passion to ensure the health of patients, families, and communities continues to improve.

RNs and APRNs are critical providers within the Veteran's Health Administration (VHA) and are on the frontlines of providing safe, cost-effective, high-quality care. Health care in our country continues to progress toward patient-centered models where all providers work to develop coordinated services through individualized plans. These plans are rapidly transitioning to better serve patients regardless of their physical address through technological advances. Across the country, telehealth services are placing qualified providers in the most remote communities. This proposed rule removes geographic barriers so that healthcare providers can reach our nation's veterans.

By moving forward on this proposed rule, the VA will enable its VHA facilities to optimally manage their resources by employing the skills of healthcare providers, acting within the scope of their VA employment. The VA must ensure all veterans, including those in remote, rural, and medically underserved areas, have the greatest possible access to mental health care, specialty

care, and general clinical care— this proposed rule is one concrete step to achieve this goal. Moreover, we applaud the VA for clearly articulating that all qualified providers and their specialties, as defined in [38 U.S.C. 7402\(b\)](#), are to be covered under this ruling. The reinforcement of maintained credentials, licensure, registration and/or certification does in fact ensure patient safety.

The successful execution and implementation of this rule will require that all providers in the VHA are utilized to the full extent of their education and clinical training, without additional burdensome requirements. We appreciate the work underway at the VA to respond to the health needs of our nation’s veterans and stand ready as your partners in achieving this end. If you have any questions, or if our coalition can be of assistance, please contact the Nursing Community Coalition’s Executive Director, Dr. Suzanne Miyamoto, at Smiyamoto@aacnnursing.org.

Sincerely,

American Academy of Nursing
American Association of Colleges of Nursing
American Association of Critical-Care Nurses
American Association of Heart Failure Nurses
American Association of Neuroscience Nurses
American Association of Nurse Anesthetists
American Association of Nurse Practitioners
American College of Nurse-Midwives
American Nephrology Nurses Association
American Nursing Informatics Association
American Organization of Nurse Executives
American Pediatric Surgical Nurses Association
American Psychiatric Nurses Association
American Society for Pain Management Nursing
American Society of PeriAnesthesia Nurses
Association for Radiologic and Imaging Nursing
Association of Community Health Nursing Educators
Association of Nurses in AIDS Care
Association of periOperative Registered Nurses
Association of Public Health Nurses
Association of Veterans Affairs Nurse Anesthetists
Association of Women's Health, Obstetric and Neonatal Nurses
Commissioned Officers Association of the U.S. Public Health Service
Hospice and Palliative Nurses Association
Infusion Nurses Society
International Association of Forensic Nurses
International Society of Psychiatric-Mental Health Nurses
National Association of Clinical Nurse Specialists

National Association of Neonatal Nurse Practitioners
National Association of Neonatal Nurses
National Association of Pediatric Nurse Practitioners
National Black Nurses Association
National Council of State Boards of Nursing
National Forum of State Nursing Workforce Centers
National League for Nursing
National Nurse-Led Care Consortium
Nurses Organization of Veterans Affairs
Oncology Nursing Society
Organization for Associate Degree Nursing
Preventive Cardiovascular Nurses Association
Wound, Ostomy and Continence Nurses Society