

September 17, 2020

Jeffrey Parrillo
Departmental Information Collection Clearance Officer
Department of the Interior at OMB–OIRA
1849 C Street NW
Washington, DC 20240

RE: Youth Conservation Corps Application and Medical History: OMB Control Number 1093–YCC

Dear Mr. Parrillo,

The American Association of Nurse Practitioners (AANP), on behalf the over 290,000 nurse practitioners (NPs) across the nation, appreciates the opportunity to provide comment in response to the Department of the Interior’s information collection request 1093-YCC, Youth Conservation Corps Application and Medical History. AANP respectfully requests that the “primary care physician contact information” field be replaced with “primary care provider contact information” in form DI-4015 “United States Youth Conservation Corps - Medical History Form” to appropriately include nurse practitioners as primary care providers.

NPs are advanced practice registered nurses who are prepared at the masters or doctoral level to provide primary, acute, chronic and specialty care to patients of all ages and walks of life. Daily practice includes: assessment; ordering, performing, supervising and interpreting diagnostic and laboratory tests; making diagnoses; initiating and managing treatment including prescribing medication and non-pharmacologic treatments; coordinating care; counseling; and educating patients and their families and communities. NPs practice in nearly every health care setting including clinics, hospitals, Veterans Health Administration and Indian Health Services facilities, emergency rooms, urgent care sites, private physician or NP practices (both managed and owned by NPs), skilled nursing facilities (SNFs), nursing facilities (NFs), schools, colleges and universities, retail clinics, public health departments, nurse managed clinics, homeless clinics, and home health. NPs hold prescriptive authority in all 50 states and the District of Columbia. NPs complete more than one billion patient visits annually.

The purpose of this information collection is to establish form DI-4014 and form DI-4015. Form DI-4015 “provides information needed to determine the physical suitability and any special medical needs of selected applicants.” The proposed form would require that an applicant include their “Primary Care Physician contact information”. It is important to note that NPs have a particularly large responsibility in primary care as approximately 73% of all NP graduates deliver primary care¹. NPs comprise approximately one quarter of the primary care workforce, with that percentage growing annually.² The Department’s authority to promulgate these forms is prescribed in 16 U.S.C. Chapter 37 “Youth Conservation Corps” § 1701-1706, which does not require a physician to complete this history. AANP respectfully requests that the “primary care physician contact information” field be replaced with “primary care provider contact information” in form DI-4015 “United States Youth Conservation Corps - Medical History Form” to include nurse practitioners as authorized primary care providers. NPs currently

¹ <https://www.aanp.org/about/all-about-nps/np-fact-sheet>.

² [Rural and Nonrural Primary Care Physician Practices Increasingly Rely On Nurse Practitioners](#), Hilary Barnes, Michael R. Richards, Matthew D. McHugh, and Grant Martsolf, Health Affairs 2018 37:6, 908-914.

provide a substantial portion of the high-quality³, cost-effective⁴ care that our communities require, and will continue to do so to meet the needs of their communities.

As noted previously, performing physical examinations, evaluating a patient's health condition, and serving as primary care providers is well within the scope of practice for nurse practitioners. Including NPs in this form would better reflect the recognized authority of NPs to perform medical examinations for federal agencies and better represent the current primary care workforce. For instance, NPs have served as Federal Motor Carrier Safety Administration medical examiners, conducting medical examinations for interstate truckers since 1992. More recently this was expanded to NPs in the Veteran's Administration. They also serve as primary care providers in the Veteran's Administration, the Medicare and Medicaid programs, and the Indian Health Service. Nurse practitioners are also authorized to complete physical examinations for the U.S. Marshals and Federal Air Marshals. The Social Security Administration also considers nurse practitioners to be acceptable medical sources for the purpose of establishing a medically determinable physical or mental impairment.

Federal agencies have long recognized that NPs are qualified to perform examinations for health or functional impairment and provide ongoing care to patients. Authorizing nurse practitioners to complete these forms will ensure access to high-quality health care for Youth Conservation Corps Applicants.

We thank you for the opportunity to comment on this proposed information collection. We look forward to working on these issues with you. Should you have comments or questions, please direct them to MaryAnne Sapio, V.P. Federal Government Affairs, msapio@aanp.org, 703-740-2529.

Sincerely,



David Hebert
Chief Executive Officer

³ <https://www.aanp.org/images/documents/publications/qualityofpractice.pdf>.

⁴ <https://www.aanp.org/images/documents/publications/costeffectiveness.pdf>.