

December 3, 2020

Social Security Administration, OLCA  
Attn: Reports Clearance Director  
3100 West High Rise, 6401 Security Blvd  
Baltimore, MD 21235

**RE: Information Collection Activity SSA-2020-0056 Medical Permit Parking Application**

To whom it may concern,

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 Social Security Administration's (SSA's) information collection Docket ID Number-SSA-2020-0056: forms SSA-3192, "Application and Statement", SSA-3193 "Physician's Report" and SSA-3194, "Renewal certification". To maintain consistency with the SSA's recognition of nurse practitioners and other clinicians as acceptable medical sources, we respectfully request the SSA change form SSA-3193 to "health care provider report." Updating this form to use provider inclusive language is consistent with the SSA's recognition of nurse practitioners as acceptable medical sources for the purpose of establishing a medically determinable physical or mental impairment.

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.

Forms SSA-3192 and SSA-3194 are used by SSA employees and contractors with qualifying medical conditions who are applying for medical parking permits. Form SSA-3193, the "physician's report", is used by an applicant's health care provider to verify the applicant's medical condition. However, the physician restrictive language used in this form is inconsistent with the SSA's recognition of nurse practitioners as acceptable medical sources. Therefore, we respectfully request the SSA change form SSA-3193 to "health care provider report". Using uniform provider inclusive language will reduce confusion for SSA employees, contractors, and health care providers. We also note that these forms were last revised in 2017, which was the same year that NPs were added to the definition of "acceptable medical source," and this language is likely based on prior guidance.

As noted previously, NPs are considered as "acceptable medical sources" by the SSA and performing physical examinations, evaluating a patient's health condition, and serving as healthcare providers is well within the scope of practice for nurse practitioners. NPs have served as Federal Motor Carrier Safety Administration medical examiners, authorized to perform medical examinations for interstate truckers since 1992. More recently this was expanded to NPs in the Veteran's Administration. Nurse practitioners

serve as health 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.

Federal agencies have long recognized that NPs are qualified to perform examinations for health, certify medical conditions or functional impairment and provide ongoing care to patients. Updating these forms to consistently recognize nurse practitioners will reduce confusion for clinicians and SSA employees and patients.

We thank you for the opportunity to comment on this information collection activity. 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](mailto:msapio@aanp.org), 703-740-2529.

Sincerely,



David Hebert  
Chief Executive Officer