

March 28, 2023

Maribel Aponte
VA PRA Clearance Officer
United States Department of Veterans Affairs
Office of Enterprise and Integration
Data Governance Analytics (008)
810 Vermont Ave. NW
Washington, DC 20420

RE: Preauthorization and Request for Payment of Bowel and Bladder Services, OMB Control No. 2900-NEW

Dear Clearance Officer Aponte,

The American Association of Nurse Practitioners (AANP), representing more than 355,000 nurse practitioners (NPs) in the United States, appreciates the opportunity to provide comment on the agency information collection on the forms for the preauthorization and request for payment of bowel and bladder services. AANP is committed to empowering all NPs to advance high-quality, equitable care, while addressing health care disparities through practice, education, advocacy, research, and leadership (PEARL).¹ NPs play an important role in providing care to our nation's Veterans.

As you may know, 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 backgrounds. 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 hold prescriptive authority in all 50 states and the District of Columbia (D.C.) and perform more than one billion patient visits annually.

NPs practice in nearly every health care setting including VHA facilities, hospitals, clinics, Indian Health Services facilities, emergency rooms, urgent care sites, private physician or NP practices (both managed and owned by NPs), skilled nursing facilities (SNFs) and nursing facilities (NFs), schools, colleges and universities, retail clinics, public health departments, nurse managed clinics, homeless clinics, and home health care settings.

As you are aware, since December of 2016, NPs have been authorized to practice to the full extent of their clinical education and training within Veterans Health Administration (VHA) facilities, and serve as primary care providers in the VHA. The Veteran's Administration has found that “[d]ata demonstrates that FPA for APRNs has a positive impact on wait times in Mental Health, Specialty Care and Primary Care.”² It is important to note that NPs have a particularly large impact on primary care as approximately 70% of all NP graduates deliver primary care.³ In fact, they comprise approximately one quarter of the primary care workforce, with that percentage growing annually.⁴

¹ <https://www.aanp.org/advocacy/advocacy-resource/position-statements/commitment-to-addressing-health-care-disparities-during-covid-19>

² <https://www.va.gov/oei/docs/va-strategic-plan-2022-2028.pdf>, at page 33.

³ <https://www.aanp.org/about/all-about-nps/np-fact-sheet>.

⁴ [Rural and Nonrural Primary Care Physician Practices Increasingly Rely On Nurse Practitioners](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6187003/), Hilary Barnes, Michael R. Richards, Matthew D. McHugh, and Grant Martolf, Health Affairs 2018 37:6, 908-914.

The forms within this information collection, VA forms 10-314a and 10-314b, will be used to: request preauthorization of bowel and bladder services, certify that caregivers have been properly trained and meet all requirements for safely rendering care to Veterans, and for caregivers to receive reimbursement for bowel and bladder care services. We appreciate that in form 10-314b, the agency uses the term 'provider' when referencing health care providers seeking reimbursement for bowel and bladder care services. However, form 10-314a uses the terms 'prescribing physician' and "physician information" when referencing the health care provider who is requesting the preauthorization. It later uses the term 'licensed health care provider' when referencing the clinicians authorized to certify that caregivers have been properly trained and meet all requirements for safely rendering bowel and bladder care to Veterans.

As noted above, since December of 2016, NPs have been authorized to practice to the full extent of their clinical education and training within Veterans Health Administration (VHA) facilities and serve as primary care providers in the VHA. Requesting preauthorization for bowel and bladder services is well within the scope of practice for nurse practitioners. Therefore, we respectfully request the agency amend form 10-314a to consistently use the term 'licensed health care provider' in referencing the prescribing health care provider. This change will ensure uniformity of the language within form 10-314a, consistency with form 10-314b, and equitable access to these services.

We thank you for the opportunity to comment on this agency information collection. We look forward to working on this issue with you. Should you have comments or questions, please direct them to MaryAnne Sapiro, V.P. Federal Government Affairs, msapiro@aap.org, 703-740-2529.

Sincerely,



Jon Fanning, MS, CAE, CNED
Chief Executive Officer
American Association of Nurse Practitioners