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Medical
Association
of Georgia

Building a Better State of Health Since 1849

Office of the President

July 11, 2016

The Honorable Robert A. McDonald
Secretary
U.S. Department of Veterans Affairs
810 Vermont Avenue NW, Room 1068
Washington, DC 20420

Re: RIN 2900-AP44-Advanced Practice Registered Nurses

Dear Secretary McDonald:

I am writing on behalf of the Medical Association of Georgia (MAG), which represents more than 7,800 physicians in every specialty and practice setting. As the leading advocate for the medical profession in the state, MAG is opposed to the proposed rule that would allow advanced practice registered nurses (APRNs) – including nurse anesthetists – to provide services to U.S. Department of Veterans Affairs (VA) health care system patients without the clinical oversight of a physician (i.e., ‘RIN 2900-AP44-Advanced Practice Registered Nurses’ aka the ‘VA Proposed APRN Rule’) because it would undermine their care.

Georgia law requires APRNs to work under the supervision of a physician, an approach that has a long and proven track record in our state. Changing this law would compromise the standard of care for veterans, which is one of our most vulnerable populations – and keeping in mind that VA patients often have complex medical conditions that pose a greater risk of complications during surgery.

MAG believes that the VA should continue to use a physician-led, team-based model of care to ensure that veterans have access to adequately trained physicians – especially in the event of an emergency or a complication during surgery and especially when it comes to imaging, imaging diagnostics, anesthesiology, perioperative medicine, and acute care settings.

It is also worth emphasizing that there is no shortage of physician anesthesiologists in the VA system.

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Finally, MAG believes that creating different standards of medical care for non-physicians could result in widespread confusion and errors that will undermine the care that VA patients receive.

With these factors in mind, MAG urges the U.S. Department of Veterans Affairs to reject the proposed APRNs rule.

Sincerely,

A handwritten signature in black ink, appearing to read "John S. Harvey". The signature is fluid and cursive, with a large loop at the end.

John S. Harvey, M.D.
President

JSH:TK/dg