



December 20, 2018

Mick Mulvaney
Director
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Director Mulvaney,

On behalf of the more than 123,000 PAs (physician assistants) throughout the United States, and the more than 2,200 PAs currently employed full-time by the U.S. Department of Veterans Affairs (VA), the American Academy of PAs (AAPA) would like to request any proposals included in President Donald Trump's FY 2020 Budget related to the VA ensure that the VA's PA workforce is fully utilized to help reduce the backlog in providing care to veterans.

The President's FY 2019 Budget included two legislative proposals put forward by the VA that would have been more effective in helping the VA recruit and retain needed healthcare practitioners had PAs been included in them. One provision allowed for the reimbursement of up to \$1000 for continuing professional education (CPE) expenses for advanced practice registered nurses (APRNs) and the other provision sought to raise the salary cap for certain nurses at the VA. While AAPA is supportive of both proposals if they were equally applied to relevant health professions, the exclusion of the PA profession was detrimental to the intent of the proposals.

AAPA is appreciative that senior staff in the Office of Management and Budget (OMB) VA Defense Health Branch met with AAPA representatives near the end of the FY 2019 budget process. We appreciated the opportunity to have positive dialogue with OMB staff, and are hopeful any related provisions included in the FY 2020 budget will include the PA profession.

AAPA is also appreciative of the work the White House and several agencies recently undertook in issuing the report [Reforming America's Healthcare System Through Choice and Competition](#). We think it is noteworthy the report acknowledged significant contributions providers such as PAs and advanced practice nurses can make when properly utilized to "safely and effectively provide some of the same healthcare services as physicians." As the Administration continues its work on the FY 2020 budget, we would like to continue to work with you to make sure the needs of the PA workforce and the veterans they serve at the VA are taken into consideration.

PA Background

Timely access to quality patient care is one of the most critical issues facing our nation's veterans. AAPA believes PAs are a key part of any plan for increasing access to quality medical care at VA medical

facilities. PAs provide high quality, cost-effective medical care in virtually all health settings and in every medical and surgical specialty. The rigorous education and clinical training of PAs enables them to be fully qualified and equipped to manage the treatment of patients who present with both physical and mental illnesses. PAs are educated to seamlessly work in a healthcare team, and they manage the full scope of patient care, often handling patients with complex diagnoses or multiple comorbidities, situations which commonly occur within the nation's veteran population. PAs are front line healthcare providers, and are frequently the main point of contact for their patients at VA medical facilities.

The PA profession has long been connected and committed to veterans and veterans' healthcare. The first PA students were Navy Corpsmen who served in the Vietnam War; and recruitment of and support for veterans in PA educational programs continues to this day. As of 2014, nearly 12% of all PAs are veterans, active duty or retired military, or in the National Guard and Reserves, and more than 2,200 PAs are currently employed full-time by the VA.

PAs are currently classified by the VA Office of Inspector General as a critical occupation facing significant staffing shortages in the VA system, and the 2015 Veterans Health Administration (VHA) Workforce Planning Report identified PAs as having "one of the highest administrative quit rates, retirement rates and total loss rates of any of the mission critical occupations" within the VHA.

VA Legislative Proposals Impacting PAs

The President's FY19 budget proposal included a provision that would allow for the reimbursement of up to \$1000 for CPE expenses for advanced practice registered nurses. AAPA supports reimbursement for CPE, but believes it is essential that such a proposal also include PAs.

PAs are advanced practice providers and frequently perform and compete with nurse practitioners (NPs) for the same jobs at the VA. PAs must complete 100 hours of continuing medical education (CME) every two years to maintain their certification, a requirement for VA employment. To allow for the reimbursement of CPE expenses for one profession and not the other would create an inequity. Furthermore, there is no medical or policy justification for making this move for one profession and not the other.

The President's FY19 budget proposal also included a provision to raise the salary cap for the entire nursing profession. Again, AAPA supports raising salary caps for critical health professions, but believes it is essential that such a proposal include PAs.

Advancing this proposal without including PAs would be in direct contradiction to the spirit and effect of Section 212 of the VA Choice and Quality Employment Act of 2017 (Public Law 115-46). This law ensures competitive pay for PAs at the VA by taking in to consideration private sector PA salaries in local markets when establishing compensation for PAs at VA facilities, and put PAs on the same pay schedule as their nursing counterparts.

If PAs are excluded from incentives offered to other providers – many of whom serve in the same positions as PAs – it will only become harder for the VA to employ the nation's PA workforce. Not allowing PAs to have the same recruitment incentives and retention benefits as their similarly situated advanced nursing colleagues will only serve to further erode the VA's PA workforce, which we do not believe is the intent of the proposals or of the VA.

Going forward, AAPA would like to restate our requests from our December 29, 2017, letter to you regarding these issues.

- 1) That PAs be included in the reimbursement for CPE expenses and salary cap proposals if they are included in the President's FY20 budget request
- 2) That PAs be included in any new relevant proposals considered for inclusion in the President's budget requests moving forward

As always, AAPA stands ready to assist the OMB in meeting its challenge to provide veterans with timely access to high quality medical care. Should you have any questions or require additional information, please do not hesitate to reach out to Tate Heuer, AAPA Vice President, Federal Advocacy, at 571-319-4338 or at theuer@aapa.org.

Thank you for your assistance, and we look forward to continuing this dialogue with you and your staff.

Sincerely,

A handwritten signature in black ink that reads "Jennifer L. Dorn". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Jennifer L. Dorn
Chief Executive Officer