

TALKING POINTS FOR COMMENTS TO THE VA

1. Introduction

- Introduce yourself, including your profession and certifications.
- Thank the VA for allowing you to submit comments on the proposed rule 38 CFR Part 17.
- Specifically mention that you are commenting on Section § 17.415(d)(1)(i)(B), which grants Certified Nurse Practitioners (CNP) full practice authority to order, perform, supervise, and interpret laboratory and imaging studies.
- Recognize the VA's attempt to provide better health services for our nation's veterans, BUT highlight that the proposed rule would undermine the quality of care that the VA aims to provide for veterans.
- Specify that nuclear medicine is a specialty profession that, due to its use of radioactive pharmaceuticals, requires those who "order" and "interpret laboratory and imaging studies" to have specialized education, training and experience.

2. Highlight your unique position in nuclear medicine (tailor to your area of practice)

- **If you are a physician:** As a nuclear medicine physician qualified to "interpret laboratory and imaging studies," I completed [# OF YEARS] of study through an ABNM/ABR-accredited program.
 - DETAIL YOUR EDUCATIONAL REQUIREMENTS.
 - Recognize that although an APRN may also have extensive educational training, it does not compare to the [# OF YEARS] you had to complete in order to interpret images.
- **If you are a technologist:** As a nuclear medicine technologist qualified to "perform" nuclear medicine imaging studies, I completed [# OF YEARS] of study through ARRT/NMTCB/etc.
 - Highlight an aspect of your training that it would be difficult for an APRN to replicate (e.g., radiation safety and compliance with NRC's 10 CFR Part 35).
 - State why this training is particularly important in the practice of nuclear medicine (e.g., radiation safety is critically important to follow to minimize radiation exposure to patients, health care personnel, and the general public).

3. Conclusion

- Summarize how your level of education and training better qualifies you (better than a CNP) to practice nuclear medicine.
- Reiterate your opposition to Section § 17.415(d)(1)(i)(B).
- Reiterate how allowing CNPs to ["perform"] OR (depending on your position) ["interpret laboratory and imaging studies"] will not enhance the level of care received by veterans. Instead, while combining all imaging services under a CNP may seem more efficient, a CNP's lack of qualifications could result in misdiagnoses, overutilization of imaging procedures, and a general deterioration in the level of care the VA is able to provide to veterans.