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Edith Ramirez, JD
Chairwoman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

**RE: Public Workshop, "Examining Health Care Competition" ("Health Care Workshop")
Project No. P13-1207**

(submitted electronically at <https://ftcpublic.commentworks.com/ftc/healthcareworkshop/>)

Dear Chairman Ramirez,

On behalf of more than 7,500 pediatric nurse practitioners (PNPs) committed to providing optimal health care to children, the National Association of Pediatric Nurse Practitioners (NAPNAP) appreciates the opportunity to submit comments to the Federal Trade Commission (FTC) for the record of its March 20-21, 2014, workshop on "Examining Health Care Competition." NAPNAP and its members are grateful to you and the Commission for convening this workshop and for your diligence in scrutinizing federal and state statutes and regulations to ensure and promote fair competition in health care markets.

As you know, PNPs are licensed, independent, advanced practice nurses who have advanced education in pediatric nursing and health care using evidence based practice guidelines. Dedicated to improving children's health, they practice in primary care, specialty, and acute care settings. PNPs have been providing quality health care to children and families for more than 40 years in an extensive range of practice settings such as pediatric offices, schools, and hospitals – reaching millions of patients across the country each year. PNPs provide care to newborns, infants, children, adolescents and young adults that includes health and developmental screening, managing acute and chronic conditions, ordering and interpreting diagnostic tests, prescribing medications, giving immunizations, coordinating care across the health care continuum, and making referrals to other professionals as appropriate. The patient and family-centered nature of nurse practitioner education, which includes consideration of social determinants of health and environmental, family, and cultural factors, prepares PNPs to holistically care for, support, and counsel children and their families.

Unfortunately, as the Commission heard in March and is well aware from years of examining scope of practice laws and regulations, the ability of PNPs to provide the full range of care they have been educated and clinically prepared to furnish is too often obstructed by outdated and misguided limitations. These anti-competitive barriers can deny families the ability to choose health care professionals that offer access to more timely, cost-effective care to meet the needs of their children.

These issues were underscored in your recent workshop. Speakers pointed out the impact restrictions on professional scope of practice can have on impeding the development and implementation of innovative, patient-focused care. They emphasized the point that no profession should determine the scope or requirements of practice of those in other professions, and that such efforts strike at the heart of consumer-oriented competition that the FTC is authorized and empowered to enforce. As you are aware, many current restrictions on nurse practitioners are based not on evidence, patient safety, clinical criteria or patients' needs, but rather on chiefly economic interest. The message was clear that both consumers

and health care professionals are harmed when factors other than education and clinical training are allowed to define or influence the ability of providers to practice in a truly competitive market.

Much work remains to be done to ensure a truly competitive marketplace for health care services. NAPNAP urges the Commission to expand its analysis of current and proposed statutes and regulations to: determine the minimum level of restrictions on health care professionals' scope of practice necessary to ensure public safety; assess the impact of restrictive policies on access and affordability of care; and ensure that all appropriate stakeholders, including patients and health professions, are able to participate effectively in the development of practice regulations. Further, we urge you to remain sensitive to the special needs and problems of different patient populations, particularly infants, children, and adolescents who face a host of challenges with adequate access to and coverage for the full range of necessary and affordable health care.

As more and more children and families gain access to health care coverage and our delivery system adapts to meet increasing demands for primary and acute care and for specialized services, it becomes even more essential that PNs and other health care providers be able to practice to the fullest extent of their education, clinical preparation, and licensure. We hope the outcome of this workshop is both a better understanding of the nature and the impact of anti-competitive restrictions on health care providers' scope of practice and a renewed commitment by the Commission to work with patients and providers to ensure fair and balanced professional regulation.

Again, NAPNAP is grateful to you for the opportunity to participate in this workshop and share our observations. We eagerly look forward to working with you, your colleagues, and your staff to continue to provide better access to affordable health care in fair and competitive markets that enable PNs and other providers to furnish the best possible care for our patients. Please contact Michele Stickel (202-223-2250; mstickel@napnap.org) if you have any questions or would like additional information.

Sincerely,

Mikki Meadows-Oliver, PhD, CPNP
President