



May 1, 2014

Donald S. Clark
Secretary
Federal Trade Commission
Office of the Secretary, Room H-113
600 Pennsylvania Avenue NW
Washington, D.C. 20580

Re: Health Care Workshop, Project No. P131207

Dear Secretary Clark:

AARP is pleased to provide comments on the Professional Regulation of Health Care Providers. AARP is a nonprofit, nonpartisan organization, with a membership of nearly 38 million, that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. Access to affordable, high-quality care has long been a top priority for AARP. Central to achieving this objective is assuring an adequate supply and mix of quality health care providers and allowing these professionals to provide care to consumers to the full extent of their education and training. AARP supports policies which remove federal and state barriers to practice by these providers to improve consumer access to care. AARP supports the Federal Trade Commission's (FTC) attention to this important issue and its efforts to encourage removal of burdensome provisions that reduce access to quality care, increase health costs, and impede competition and innovation.

The problems facing our health care system—an aging population with increasingly complex conditions, an inadequate supply of providers, and high costs -- require modernized approaches to care delivery. Part of the solution should include the participation and contribution of all health professionals to the full extent of their education and training. The FTC should encourage federal and state policy makers to take this approach, as explained in the FTC's recent staff paper, *Policy Perspectives: Competition and the Regulation of Advanced Practice Nurses*. AARP supports the findings of this staff paper

Comments

Improving Access to Care and Controlling Health Care Costs:

Across the nation, states are considering legislation to update outdated regulations that prevent advanced practice registered nurses (APRNs) from practicing to the full extent of their education and training. Burdensome requirements for contractual agreements with physicians prevent APRNs from providing care to consumers and offer no additional

benefit. These barriers often delay care to consumers, especially in rural and urban underserved areas where few physicians are even available to enter into these agreements with APRNs. These restrictions add unnecessary costs, often requiring payments to doctors for collaboration, and take precious time away from patient care.

Supporting Unpaid Family Caregivers:

When care is delayed, it hurts both patients and family caregivers, who all too often bear the brunt of providing and overseeing the care of a loved one. Health care consumers and family caregivers rely on APRNs for assessing and diagnosing conditions, prescribing medications, referring to specialists, and doing so without long travel times or waits for appointments.

Delivering High-Quality Care:

Decades of evidence demonstrate that within the parameters of their education and training, APRNs provide the same high quality of health care as physicians, with or without physician supervision. A report from the National Governors Association (NGA), *The Role of Nurse Practitioners in Meeting Increasing Demand for Primary Care*, documents the evidence that consumers are highly satisfied with the high quality of care they obtain from their nurse practitioners. The NGA recommends that states consider removing barriers to practice for nurse practitioners, emphasizing their role in consumers' growing demand for primary care. This evidence is central to the Institute of Medicine's 2011 report, *The Future of Nursing: Leading Change, Advancing Health*, which calls for changes at the state and federal levels to help increase consumer access to care by enabling APRNs to practice to the full extent of their education and training.

Expanding Consumer Choices:

Advanced practice registered nurses, such as nurse practitioners, are educated and trained to provide high-quality primary health care. Like physicians, they assess, diagnose, and manage patients' care, prescribe medications and refer patients to specialists. Consumers should have the choice of seeing any clinician who is educated, trained, and licensed to provide effective care. Removing unnecessary regulations will improve consumer access to primary care clinicians when and where they need one and reduce the wait time for care for both consumers and family caregivers.

AARP appreciates this opportunity to comment and would be pleased to work with the FTC and through our states offices to continue safeguarding patient health and helping to ensure high-quality, high-value care for consumers. If you have any questions, please feel free to contact Winifred Quinn, co-director of AARP's Center to Champion Nursing in America, at wquinn@aarp.org.

Sincerely,

David Certner
Legislative Counsel and Legislative Policy Director
Government Affairs