



Office of Commissioner  
Rebecca Kelly Slaughter

UNITED STATES OF AMERICA  
**Federal Trade Commission**  
WASHINGTON, D.C. 20580

**DISSENTING STATEMENT OF COMMISSIONER  
REBECCA KELLY SLAUGHTER**

Regarding the FTC Staff Comment on the VA's Interim Final Rule on the Authority of VA  
Professionals to Practice Health Care

*Commission File No. V210000*  
January 15, 2021

I regretfully dissent from the Commission's vote to authorize a staff comment to the Department of Veterans Affairs ("VA") regarding its Interim Final Rule, Authority of VA Professionals to Practice Health Care. The Rule confirms that VA health care professionals licensed by one state and working within the scope of their VA employment may work in any state, under the VA's national standard of practice, regardless of where they are licensed or scope of practice. I generally concur with the statement of Commissioner Chopra, who agrees with the staff comment that license portability may provide substantial benefits but contends that we should not ignore the risks that overbroad preemption may pose.

I write separately to state my view that we could have found common ground between the views espoused by my colleagues on both sides of the aisle; the party-line vote on this advocacy, decried by Commissioners Phillips and Wilson, was hardly the only outcome available to us. Especially considering that the VA's Rule has already been published, I find it unfortunate that we did not take the time to find an available consensus.