



July 21st, 2016

Department of Veterans Affairs
Director, Regulations Management (O2REG)
810 Vermont Avenue, NW
Room 1068
Washington, DC 20420

RIN 2900-AP44 – Advanced Practice Registered Nurses

Dear Secretary McDonald,

As the leading national trade association serving companies that own, operate, and support professionally managed senior living communities in the United States, Argentum is in full support of the Advanced Practice Registered Nurses VA proposal.

Since 1990, Argentum has advocated for choice, accessibility, independence, dignity, and quality of life for all older adults. Argentum member companies operate senior living communities offering assisted living, independent living, and memory care services to older adults and their families. Argentum is the largest national association exclusively dedicated to supporting companies operating professionally managed, resident-centered senior living communities and the older adults and families they serve. For the past 26 years Argentum has been committed to championing quality of life for older adults and enhancing consumer choice. Many seniors and their families turn to senior living communities, often during a time of crisis, to provide the services and supports needed to care for their loved ones.

According to the 2014 National Study of Long Term Care Providers conducted by the National Center for Health Statistics, 835,200 residents live in 30,200 senior living communities. The average profile of a resident living in a senior living community is 85 years old, needs assistance with 3 or more activities of daily living, and takes an average of 9 medications a day. Approximately 77% need assistance managing those medications. Over 40% of the residents have Alzheimer's or a related form of dementia. Assisted living is typically 50% less expensive than a skilled nursing facility and 83% of our residents pay from their own private resources.

As the baby boomer generation continues to age, many of whom are veterans, the increase of chronic illnesses and cognitive impairment will begin to rise along with the need for access to healthcare and nursing services. Because about 70% of the 65-plus

population- including many people with cognitive impairment – requires some form of long-term care, according to the U.S. Department of Health and Human Services, the aging U.S. population will create unprecedented demand for nursing services. Advancing the practice of Registered Nurses will play an integral role for the future of veterans of all ages.

Argentum applauds the VA for proposing these rules and we agree qualified advanced practice registered nurses at the VA shall be granted their full practice authority. Registered nurses, licensed practice or vocational nurses serve a very important role within a senior living community, they are truly the backbone of healthcare service for seniors. Argentum, and its over 7,000 members are honored to currently serve thousands of veterans and their spouses in our communities.

Thank you for the opportunity to comment our support for the Advanced Practice Registered Nurses proposed rule. Anyone who has worn the uniform in defense of our country has earned the right to have access to quality care in time of need. By expanding the practice rights for Registered Nurses at the VA will ensure veterans will receive the quality health care they deserve.

Sincerely,

A handwritten signature in black ink, appearing to read 'JB', with a stylized flourish extending to the right.

James Balda
President and CEO
Argentum