



February 7, 2022

Xavier Becerra
Secretary
Department of Health and Human Services
200 Independence Ave SW
Washington, DC 20201

Dear Secretary Becerra:

On behalf of the American Association of Colleges of Nursing (AACN), I want to thank you for convening a stakeholder roundtable and listening session on ways the Department of Health and Human Services (HHS) and the Administration can address the needs of the healthcare community during COVID-19 and beyond. As the voice of academic nursing, with nearly 840 member schools, 580,000 baccalaureate, graduate, and post-graduate students, and more than 52,000 faculty members who serve as scientists, educators, and practitioners, AACN members are answering the call, all while preparing today's students to be tomorrow's frontline providers. It was a privilege to discuss with you the vital role that nursing education plays in our nation's healthcare response and highlight ways HHS may assist in these efforts.

We acknowledge that this conversation was the first step and appreciate your interest in garnering tangible solutions, both in the short and long term and throughout the Department, to support our schools, faculty, students, practitioners, and patients. As you and your team continue this important work, we offer a few recommendations for your consideration.

Health Resources & Services Administration (HRSA): Support for Title VIII Nursing Workforce Development Programs:

For over fifty years, Title VIII Nursing Workforce Development Programs (Title VIII of the Public Health Service Act [42 U.S.C. 296 et seq.]), under HRSA's Bureau of Health Workforce and as determined appropriate by the Secretary, have been a catalyst for strengthening nursing education at all levels, from entry-level preparation through graduate study. Through grants, scholarships, and loan repayment programs, Title VIII federal investments positively impact the profession's ability to serve America's patients in all areas, bolster diversity within the workforce, and increase the number of nurses, including those at the forefront of public health emergencies and caring for our aging population. Each Title VIII Nursing Workforce Development Program provides a unique and crucial mechanism to support nursing education and the profession. As the Department looks at ways to utilize COVID-19 relief funds and support our current and future nursing workforce, AACN suggests the following proposals under existing Title VIII programs:

- **Nursing Workforce Diversity:** As we address social determinants of health and work to build an equitable healthcare system for all patients, it is imperative that we recruit individuals from diverse backgrounds to the nursing profession. Increasing diversity in the profession will not only support lifelong career pathways, but will also improve care quality and access to care. The Nursing Workforce Diversity (NWD) program serves as a

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glowing example of a successful Title VIII initiative that accomplishes this goal. In fact, in Academic Year 2019-2020, the NWD program awarded grants supporting 11,620 nursing students from disadvantaged backgrounds.¹ As we continue to focus on diversity within the nursing profession, we suggest new relief funding be dedicated to:

- *Creating a demonstration program where grants would be awarded to accredited schools of nursing to help them increase enrollment and graduation of underrepresented racial and ethnic students.*
 - *Providing resources to further support programs that allow for students from diverse backgrounds to earn their Bachelor of Science in Nursing (BSN) degree from an accredited school of nursing.*
- **Advanced Nursing Education:** Advanced Nursing Education Programs help boost qualified nurses in the primary care workforce through traineeships as well as development of curriculums and faculty at schools and universities. Even prior to COVID-19, demand for additional nurses was expected to increase with the Bureau of Labor Statistics projecting the need for some Advanced Practice Registered Nurses (APRNs) to grow 45% by 2030.² *We recommend developing a pilot program from emergency relief funding for schools of nursing to apply should they need additional support for preceptors, clinical training sites, or faculty for their graduate programs, as this is an immediate step to support our future frontline providers.*
 - **Nurse Education, Practice, Quality, and Retention:** The Nurse Education, Practice, Quality, and Retention program seeks to bolster academic, service, and continuing education projects to strengthen nursing education and the quality of patient care by increasing nurse retention and supporting the nursing workforce. *As we prepare for future public health emergencies and confront ongoing pandemics and epidemics, a pilot program for master's and doctoral nursing students and practicing nurses to support the work of public health departments, needs to be created. By investing in our public health infrastructure, nursing students and practitioners could gain real world experience both as a preceptor (nurses) and in didactic and clinical education (student), all while supporting the public health of a community.*

Centers for Medicare and Medicaid Service: Opportunity under Merit-Based Incentive Payment System (MIPS)

In 2018, the Centers for Medicare and Medicaid Services (CMS) acknowledged a significant initiative in the Quality Payment Program "Providing Education Opportunities for New Clinicians." CMS had acknowledged the severity of the clinical training site shortages and had taken the important step to address this challenge. The 2018 improvement activity worked towards granting credit to clinicians eligible for the Merit-Based Incentive Payment System (MIPS) who serve as preceptors for students. CMS should recognize that serving as a preceptor has a significant impact on beneficiary care, safety, health, and clinician wellbeing and exposes learners to high

¹ Department of Health and Human Services Fiscal Year 2022 Health Resources and Services Administration Justification of Estimates for Appropriations Committees. Page 159. Retrieved from:

<https://www.hrsa.gov/sites/default/files/hrsa/about/budget/budget-justification-fy2022.pdf>

² U.S. Bureau of Labor Statistics. (2020). Occupational Outlook Handbook- Nurse Anesthetists, Nurse Midwives, and Nurse Practitioners. Retrieved from: <https://www.bls.gov/ooh/healthcare/nurse-anesthetists-nurse-midwives-and-nurse-practitioners.htm>

quality, value-based practices that will pay dividends in improved care now and into the future. *Therefore, AACN strongly supports the immediate solution of implementing the 2018 recommendation to update the Quality Payment Program on preceptor funding.*

Substance Abuse and Mental Health Services Administration: Supporting the mental health of patients and providers and developing the next generation of mental health practitioners.

During these unprecedented times, mental health challenges have come to light. As highlighted in a recent survey published in *Nurse Educator*, nearly a quarter of graduate nursing students reported elevated levels of stress, anxiety, and depression over the past year.³ This statistic is becoming all too familiar as another study of college students found that, “39 percent have symptoms of major depression, 66 percent are battling loneliness, and 13 percent have seriously considered suicide.”⁴ We appreciate additional investments in the American Rescue Plan to support mental health for patients, students, and practitioners; however, we recognize more must be done. *As implementation of these policies are considered, we strongly encourage you to provide support for our nation’s caretakers by explicitly distributing funding to nursing students, faculty, and nurses.*

Further, we recognize that additional mental health providers are necessary to address the current and future mental health needs across the country. *To that end, AACN supports developing a pilot program to increase the enrollment and graduation of psychiatric mental health nurses and psychiatric mental health nurse practitioners by providing resources to schools of nursing to grow and modernize these programs. In addition, we ask that you provide schools of nursing with funding to hire psychiatric mental health faculty to educate the increasing number of students.*

Office of the Assistant Secretary for Preparedness and Response: Preparing for Tomorrow

From Delaware to California and across America’s heartland, our nursing faculty and students have been on the frontlines volunteering, testing, tracking, tracing, and administering vaccines during COVID-19. This is not the first time AACN members have answered the call to mobilize in response to a federal priority. In the midst of the opioid epidemic, and working with the Obama Administration, AACN joined with more than 40 healthcare groups to launch a national nursing education initiative for our schools in support of a broad public awareness campaign.⁵ As we prepare for the future, there is an opportunity to be proactive and begin educating our nursing students so they are ready to respond to emerging threats. *Given this, we urge the development of an emergency response and disaster preparedness pilot program to prepare the future generation of frontline nurses to respond to the next public health challenge.*

We are proud of the nurse educators and students who illustrate their tenacity, courage, and leadership in the fight against COVID-19. AACN, together with nursing schools in communities across the country, stand ready to be active partners. As you continue your essential work to usher us through this time and lay the foundation for best practices that prioritize our nation’s health, AACN remains committed to assisting your team as they implement sound policy. If we can be of

³ Nurse Educator (2021). A Survey of Mental Health in Graduate Nursing Students during the COVID-19 Pandemic. Retrieved from:

https://journals.lww.com/nurseeducatoronline/Abstract/2021/07000/A_Survey_of_Mental_Health_in_Graduate_Nursing.13.aspx

⁴ NBC News (2021). College Students Struggle with Mental Health Amid the Pandemic. Retrieved from:

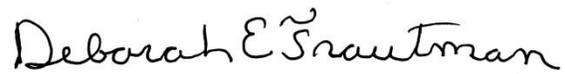
<https://www.nbcnews.com/nightly-news/video/college-students-struggle-with-mental-health-amid-the-pandemic-110427717528>

⁵ American Association of Colleges of Nursing, “AACN Partners with the White House to Educate America’s Nurses on Prescription Drug Abuse.” October 21, 2015. [https://www.aacnnursing.org/News-](https://www.aacnnursing.org/News-Information/PressReleases/View/ArticleId/21525/prescription-drug-abuse)

[Information/PressReleases/View/ArticleId/21525/prescription-drug-abuse](https://www.aacnnursing.org/News-Information/PressReleases/View/ArticleId/21525/prescription-drug-abuse)

any assistance with your efforts, please contact AACN by reaching out to Dr. Colleen Leners, Director of Policy at cleners@aacnursing.org, or Rachel Stevenson, Director of Government Affairs at rstevenson@aacnursing.org.

Sincerely,

A handwritten signature in black ink that reads "Deborah E. Trautman". The signature is written in a cursive, flowing style.

Deborah E. Trautman, PhD, RN, FAAN
President and Chief Executive Officer