



July 22, 2022

Admiral Rachel L. Levine, MD
Assistant Secretary for Health
HHS Office of the Assistant Secretary for Health
200 Independence Avenue, SW
Washington, DC 20201

RE: Request for Information: HHS Initiative to Strengthen Primary Health Care

Dear Assistant Secretary Levine,

The American Association of Colleges of Nursing (AACN) welcomes the opportunity to offer the following comments regarding the Request for Information on the HHS Initiative to Strengthen Primary Health Care. As the national voice for academic nursing, AACN works to establish quality standards for nursing education; assists schools in implementing those standards; influences the nursing profession to improve health care; and promotes public support for professional nursing education, research, and practice. AACN represents more than 850 schools of nursing offering a mix of baccalaureate, graduate, and post-graduate programs at public and private universities nationwide.¹

AACN has a vested interest in improving our nation's health and health care. For over five decades, the association has championed professional nursing education to ensure that Registered Nurses (RN) and Advanced Practice Registered Nurses (APRN), including nurse practitioners, certified nurse-midwives, certified registered nurse anesthetists, and clinical nurse specialists, are prepared to provide evidence-based, cost effective, and high-quality care. Within AACN member schools, more than 120,000 nursing students are currently enrolled in APRN programs and will serve as our nation's next generation of expert providers.²

As our nation combats primary care challenges especially as it relates to the nursing workforce shortage, access to nursing care is imperative and ensuring a robust nursing pathway is essential. Below are AACN's comments in response to the HHS Initiative to Strengthen Primary Health Care with recommendations on actions the administration should take to strengthen equitable access to high quality primary care. We appreciate your leadership to investigate these challenges and the opportunity to work with you and your colleagues in the Administration to address them.

Recommendation: Permanently Reduce Barriers and Increase Access to Telehealth

¹ About the American Association of Colleges of Nursing. Retrieved from: <https://www.aacnnursing.org/About-AACN>

² 2021-2022 Enrollments and Graduations in Baccalaureate and Graduate Programs in Nursing. Washington, DC: American Association of Colleges of Nursing.

We strongly support making permanent all telehealth flexibilities implemented during the COVID-19 public health emergency. We recognize the pandemic restricted the availability of personal protective equipment (PPE), which significantly impacted nursing students' ability to complete their required clinical hours. As telehealth technology allows increased flexibility and access for patients, it can also be utilized to satisfy some of the direct nursing clinical hours required by state boards of nursing, thereby ensuring schools of nursing can continue meeting the needs of the healthcare system now and in the future.³ Schools of nursing have been encouraged to develop contingency plans should future restrictions on clinical placements occur due to safety concerns for students. These plans may include the expanded use of simulation, telehealth, and virtual reality in keeping with best practices and guidelines from state boards of nursing. With the use of telehealth and digital health expanding, this shift offers new opportunities to focus on primary care creating a broader scope of practice and enhancing care delivery.

In addition, telehealth expanded quality primary-care access to rural and underserved communities by eliminating barriers such as transportation needs and reducing overall costs. Telehealth provides more feasible specialty services without having to staff rural facilities and can serve a broader range of medical conditions⁴. The continued support of telehealth and digital health has grown in usefulness, benefits, and convenience while being more sustainable for primary care, especially in rural and underserved communities. AACN encourages prioritization of telehealth flexibilities in the HHS plan for strengthening primary health care.

Recommendation: Bolster Health Workforce to Ensure Delivery of Quality Care Services

The demand for nurses is growing faster than average for all occupations, with the Bureau of Labor Statistics projecting the need for RNs to increase 7% and for APRNs to increase 45% by 2029, representing the need for an additional 221,900 jobs⁵. In the Josiah Macy JR Foundation report on Registered Nurses: Partners in Transforming Primary Care, mentioned that RNs, who compose of one of the largest licensed health professions, can help alleviate the pressures within primary care, yet they have been underutilized in these settings⁶. However, practices that have used RNs in primary care settings have shown an improvement in health outcomes, reduced costs, and increased patient satisfaction.

Expanding support for Title VIII programs in the HHS plan for strengthening primary health care will ensure that nursing pathways remain strong through advancing programs

³ "Considerations for COVID-19 Preparedness and Response in U.S. Schools of Nursing American Association of Colleges of Nursing, www.aacnnursing.org/News-Information/COVID-19/AACN-Recommendations

⁴ "Telehealth Use in Rural Healthcare", Rural Health Information Hub
<https://www.ruralhealthinfo.org/topics/telehealth>

⁵ U.S. Bureau of Labor Statistics. (2021). Occupational Outlook Handbook- Registered Nurses. Retrieved from: <https://www.bls.gov/ooh/healthcare/registered-nurses.htm>

⁶ Registered Nurses: Partners in Transforming Primary Care, (2017), Josiah Macy JR Foundation
https://macyfoundation.org/assets/reports/publications/macy_monograph_nurses_2016_webpdf.pdf

that prioritize nursing education, workforce diversity, and retention so all patients across the nation have access to care. The primary care report from NASEM mentioned that Graduate Medical Education funding should be altered to allocate support for training all professional who provide primary care, including RNs and NPs. Additionally, interviews with APRNs from the GNE demonstration project show that clinical education experiences influenced employment decisions, including increasing their inclination to provide patient care to rural and underserved populations⁷.

Expanding support for nursing education and clinical training is a needed to alleviate the healthcare shortages facing our nation. Strengthening public and private partnerships is a critical piece of this work that will help to support pathways into nursing, establish preceptor programs across the country, and solidify a strong nursing workforce.

Recommendation: Protect and Strengthen Equitable Access to High Quality and Affordable Health Care and Nullify the Need for “Incident-to” Billing for APRNs and Non-Physician Providers

AACN strongly supports allowing all providers to practice to the full extent of their education and training. Prioritizing efforts that support full practice authority and equal reimbursement for equal services is critical to establishing equitable access to affordable and high-quality health care. The authority of APRNs to prescribe medications, medical devices, medical equipment, and other healthcare services is essential to ensuring cost-effective and high-quality primary health care. However, there is inconsistent recognition of this authority, which results in increased spending, duplicative services, and a lack of timely care. This corresponds to the recommendation from *The Future of Nursing 2020-2030: Charting a Path to Achieve Health Equity* report stating:

Conclusion 3-2: Eliminating restrictions on the scope of practice of advanced practice registered nurses and registered nurses so they can practice to the full extent of their education and training will increase the types and amount of high-quality health care services that can be provided to those with complex health and social needs and improve both access to care and health equity⁸.

The NASEM primary care report also mentioned that scope of practice allows individual states to hold power determining who can practice health care, the extent of that care, and the conditions under which care is provided⁹. This is the case regardless of the national framework involving education, training, and payments surrounding healthcare providers.

To meet the nation’s healthcare needs, , the demand for RNs and NPs to provide primary care will continue to grow, especially in settings that serve rural and underserved

⁷ IMPAQ, The Graduate Nurse Education Demonstration Project: Final Evaluation Report (2019) Retrieved, July 18, 2022, <https://innovation.cms.gov/files/reports/gne-final-eval-rpt.pdf>

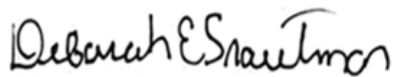
⁸ National Academies of Sciences, Engineering, and Medicine. 2021. *The Future of Nursing 2020-2030: Charting a Path to Achieve Health Equity*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/25982>

⁹ National Academies of Sciences, Engineering, and Medicine; *Implementing High-Quality Primary Care: Rebuilding the Foundation of Health Care* (2021) <https://nap.nationalacademies.org/read/25983/>

populations. As data from the American Association of Nurse Practitioners indicates, “NPs represent one in four providers in rural practices, and more states with full practice authority laws”¹⁰. Increased support of full practice authority can yield benefits for those in rural and underserved populations, especially in the area of primary care.

Thank you for your consideration of AACN’s comments on the HHS Initiative to Strengthen Primary Health Care. This regulatory focus is timely, essential, and critical to improving our health system’s efficiency, safety, and innovation. Please consider AACN an ally in this endeavor. If our organization can be of any assistance, please contact AACN’s Director of Policy, Dr. Colleen Leners at cleners@aacnnursing.org.

Sincerely,

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

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

¹⁰ National Nurse Practitioner Week: NPs Are Key to Providing Better Rural Care” AANP (2019)
<https://www.aanp.org/news-feed/national-nurse-practitioner-week-nps-are-key-to-providing-better-rural-care>