

March 9, 2022

Dawn O'Connell
Assistant Secretary for Preparedness and Response
HHS Office of the Assistant Secretary for Preparedness and Response (ASPR)
200 Independence Avenue
Washington, DC 20201

RE: Public comment in response to request for information (RFI) regarding national health security threats, challenges, and promising practices to help inform the development of the 2023-2026 National Health Security Strategy.

Dear Assistant Secretary O'Connell,

The American Association of Colleges of Nursing (AACN) welcomes the opportunity to offer the following comments regarding national health security threats, challenges, and promising practices to help inform the development of the 2023-2026 National Health Security Strategy. 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.

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 580,000 nursing students are currently enrolled in undergraduate and graduate programs and will serve as our nation's next generation of expert providers.¹

As our nation combats current and future public health challenges, access to nursing care is essential and ensuring a robust nursing pathway is imperative. The following are AACN's comments informing the development of the 2023-2026 National Health Security Strategy. These comments include strategies and policies that we recommend the Administration implement for the betterment of our health care, workforce, and national health security capabilities. We appreciate the opportunity to work with you and your colleagues in the administration as ASPR works to strengthen our nation's health through viable solutions and actions.

First, AACN highlights the national nursing workforce shortage as a national health security threat crippling our health system. In recognition of this threat, AACN recommends the following:

- Strengthen the nursing workforce pipeline by supporting and partnering with nursing schools
- Support preceptor programs for nursing students

¹ 2019-2020 Enrollments and Graduations in Baccalaureate and Graduate Programs in Nursing.
Washington, DC: American Association of Colleges of Nursing.

Second, AACN highlights promising practices critical in fortifying national health security. To advance these practices AACN recommends the following:

- Acknowledge and utilize institutes of higher education, including schools of nursing, as a resource in vaccine distributions strategies
- Further nursing leadership in health care and health policy

Addressing the National Nursing Workforce Shortage Challenge

Nurses comprise the largest sector of the healthcare workforce with more than four million RNs and APRNs². Nurse educators, students, and practitioners are leaders within their institutions and communities. Many of them are also serving on the frontlines of the COVID-19 public health emergency. Even prior to COVID-19, our nation needed additional nurses. This demand is only expected to grow as we continue to combat the pandemic and address the health care needs of all patients, including those in rural and underserved areas. In fact, the Bureau of Labor Statistics' outlook for RN workforce demand projected an increase of 9% by 2030, representing the need for an additional 194,500 jobs each year.³ Additionally, the need for most APRNs is expected to grow by 45%. This increasing demand in the nursing workforce can be attributed to several factors, such as an aging population, nursing retirements, and an increase in workplace stress. It is critical that significant effort is made to address the nursing workforce shortage to alleviate the anticipated devastating impact it may have on vulnerable communities and our nation's health system. To address this challenge, AACN offers the following recommendations for ASPR's consideration.

Strengthen the nursing workforce pipeline by supporting and partnering with nursing schools

ASPR should look for opportunities to invest in, and partner with, schools of nursing across the nation who are educating the next generation of the healthcare workforce. Many factors are associated with educational institutions, such as nursing schools, that influence how well students perform academically. These factors include academic support services, availability of facilities, and quality of nurse educators. By partnering with nursing schools, ASPR has an opportunity to provide connections to high-level facilities, bolster availability of nurse educators, and increase the capacity to offer more robust resources to support faculty and student well-being. A strong network of ASPR-nursing school partnerships would strengthen the nation's public health infrastructure while providing additional resources to limit nurse burnout and shortages, and prepare more practice-ready nurses.

Currently, ASPR's [Health Care Readiness Programs](#) help healthcare systems across the country respond to complex challenges while strengthening resources available during public health emergencies. ASPR can use these programs as a steppingstone to develop new partnerships, especially with nursing schools, that would enhance health care preparedness, efficiency, training, and response capacity, both during and outside of public health emergencies.

The support of partnerships is not only needed to supplement and maximize strategies in implementing a robust nursing workforce, but also to quantify current and future healthcare

² National Council of State Boards of Nursing. (2021). Active RN Licenses: A profile of nursing licensure in the U.S. as of April 23, 2021. Retrieved from: <https://www.ncsbn.org/6161.htm>.

³ U.S. Bureau of Labor Statistics. (2021). Occupational Outlook Handbook-Registered Nurses. Retrieved from: <https://www.bls.gov/ooh/healthcare/registered-nurses.htm>

workforce needs. Thus, partnerships should put meaningful emphasis on necessary training and sustaining optimal nurse staffing while simultaneously collaborating with schools to provide individualized student support.

Support Preceptor Programs for Nursing Students

Throughout the nation, burnout is prevalent for healthcare workers caring for COVID-19 patients, and providers are losing critical staff. Therefore, we strongly recommend that ASPR support strengthening nursing preceptorship programs, especially in rural and underserved communities. While training to become a nursing professional, skills such as time management, critical thinking, and critical reasoning are imperative in providing safe and effective patient care. Investing in preceptor programs would allow for immersive hands-on training for the future healthcare workforce.⁴

Preceptor programs provide nursing students with strong communication skills with a network of trust and respect, interprofessional teamwork skills, as well as guidance and expectations with respect to available resources.⁵ This guidance is effective in creating a continuous learning environment, leading to a positively impactful workplace, while new nurse graduates improve confidence and clinical skills.

Structure, process, and outcomes can be used as a guide for developing a comprehensive nursing preceptorship program. This includes identifying sponsors who can delegate responsibility and authority to those carrying out program actions while serving in a supportive role, establishing oversight for identifying core needs and processes of the program. Lastly, in addition to partnerships, ASPR should formally recognize that serving as a preceptor has a significant impact on beneficiary care, safety, health, and clinician wellbeing, exposing learners to high-quality, value-based practices that will pay dividends in improved care now and into the future.

Promising Practices

Acknowledge and utilize institutes of higher education, including schools of nursing, as a resource in vaccine distributions strategies.

This year, AACN launched a national campaign to elevate academic nursing's role in administering the COVID-19 vaccine. Through this initiative, over 350 nursing schools across the nation have pledged their support to engage safely with faculty, students, and other stakeholders in the work underway to administer the vaccine, as well as educate citizens on protecting themselves against the public health threat. Through this pledge, over one million shots were administered by schools of nursing to their communities. Further this work extends beyond vaccination distribution to community-based education campaigns, providing telehealth services, leading research studies, conducting contact tracing, and providing other key services.⁶ This endeavor, conducted in collaboration with the Federal Emergency Management Agency (FEMA), involved AACN notifying schools of nursing in response to FEMA-recognized need for assistance in vaccine distribution.

Higher education institutions are well positioned to contribute to the expansion of vaccine

⁴ <https://saskpreceptors.ca/documents/preceptor-manuals/PreceptorGuidelines.pdf>

⁵ <https://www.healthstream.com/resource/blog/off-to-a-good-start-nurse-preceptor-program-priorities-and-best-practices>

⁶ <https://www.aacnnursing.org/News-Information/Press-Releases/View/ArticleId/24761/national-campaign-covid-19-vaccine>

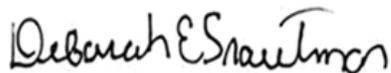
delivery and complement the ongoing work occurring in the healthcare system. ASPR also should engage the All of Us research program’s community partners, the Community and Partner Gateway Initiative (CPGI), since these groups are already deeply engaged with historically underrepresented and underserved communities, including communities of color and rural communities. Another critical partner is higher education institutions within and outside of nursing education, such as Historically Black Colleges and Universities, tribal colleges and universities, and minority-serving institutions. Connecting these higher education partners with public entities can unify, innovate, and strengthen both our vaccine distribution and general healthcare endeavors. By developing these collaborations, resulting partnerships can be leveraged to further effective and equitable distribution of the COVID-19 vaccine, as well as future vaccinations.

Further nursing leadership in health care and health policy

Nursing professionals make up the single largest segment of the healthcare workforce, according to the National Academy of Medicine report, *The Future of Nursing 2020-2030: Charting a Path to Achieve Health Equity*. The report highlights how nurses bring integral insight and value to health care and the health systems they support. Nurses are uniquely qualified and ready to assume leadership roles in the healthcare system and in the health policy arena. Further, the Federal Advisory Committee Act (FACA),⁷ enacted to ensure that advice by various advisory committees is objective and accessible to the public, requires that, “in the selection of members for the advisory committee, the agency will consider a cross-section of those directly affected, interested, and qualified, as appropriate to the nature and functions of the advisory committee”. Therefore, it is necessary that ASPR, CMS, and HHS advisory committees and boards appoint nursing professionals to leverage their experience and critical knowledge to contribute to the formation of new policy and regulations.

Thank you for your consideration of AACN’s comments to help inform the development of the 2023-2026 National Health Security Draft Strategy. This regulatory focus is timely, essential, and critical to improving our health system’s efficiency, safety, innovation, and preparedness. Again, we appreciate the opportunity to provide comments and insight on these challenges. AACN hopes to be considered an ally in this endeavor. If our organization can be of any assistance, please contact AACN’s Director of Policy, Colleen Leners at cleners@aacnursing.org.

Sincerely,



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

⁷ General Services Administration (41 CFR § 102- 3.60(b)(3))