

March 3, 2023

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Assistant Surgeon General  
Director, Office of Special Health Initiatives  
Health Resources and Services Administration  
Department of Health and Human Services  
Rockville, MD 20857

Submitted via email at [OGHpublicmeeting@hrsa.gov](mailto:OGHpublicmeeting@hrsa.gov)

Re: June 2022 Updates to Testing Services and Scores for Foreign Health Care Workers To Demonstrate English Language Proficiency

Dear Director Pedley:

Thank you for the opportunity to comment on the June 2022 updates to English language proficiency testing services and scores for foreign health care workers. The American Nurses Association (ANA) continues to support English language proficiency requirements for foreign educated nurses as effective communication is core to patient-centered care and essential for patient safety. ANA firmly believes every patient, regardless of their primary language, deserves health services delivered in their preferred language to ensure they are receiving the best information and care. Requirements for English language proficiency are consistent with this value.

Evidence shows communication between nurse and patient is critical to safe and quality care delivery.<sup>1</sup> Language barriers between patient and provider can cause “incomplete understanding of patients’ situations, delayed treatment or misdiagnoses, poor patient assessment and incomplete prescribed treatment.”<sup>2</sup> Communication skills are emphasized in nursing education and practice because they build the foundation of a therapeutic relationship.<sup>3</sup> Language comprehension, for listening and speaking, is important to build a dialogue that can achieve shared decision making with the patient. The unique role nurses hold in health education, care coordination, and patient advocacy requires nurses who can proficiently communicate within the U.S. health care system as well as with their patients. Language access remains a key goal to achieve health equity and ANA advocates for every effort to ensure patients receive culturally and linguistically appropriate care. While nurses with differing primary languages advance our health care system’s ability to meet the needs of a broad array of patients, English proficiency is necessary for successful integration within the care system and fundamental to successful interprofessional collaborative practice.

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<sup>1</sup> Lambrini Kourkouta, et al. *Communication in Nursing Practice*. *Materia Socio-Medica Journal*. February 2014. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3990376/>.

<sup>2</sup> Hilal Al Shamsi, et al. *Implications of Language Barriers for Healthcare: A Systematic Review*. *Oman Medical Journal*. April 2020. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7201401/>.

<sup>3</sup> Lambrini Kourkouta, et al. *Communication in Nursing Practice*. *Materia Socio-Medica Journal*. February 2014. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3990376/>.

ANA recommends reliance on the expertise of the Commission on Graduates of Foreign Nursing Schools International (CGFNS) in establishing recommended English proficiency passing scores.<sup>4</sup> CGFNS International places emphasis on higher thresholds for speaking proficiency scores due to the necessary dialogue between patient and nurse. They work closely with state boards of nursing on these requirements and can give important feedback on best practices. ANA urges the Health Resources and Services Administration to review CGFNS International's comments on the June 2022 updates and adopt their evidence-based recommendations.

ANA is the premier organization representing the interests of the nation's 4.4 million registered nurses (RNs) through its state and constituent member associations, organizational affiliates, and individual members. ANA advances the nursing profession by fostering high standards of nursing practice, promoting a safe and ethical work environment, bolstering the health and wellness of nurses, and advocating on health care issues that affect nurses and the public. RNs serve in multiple direct care, care coordination, and administration leadership roles, across the full spectrum of health care settings. RNs provide and coordinate patient care, educate patients and the public about various health conditions including essential self-care, and provide advice and emotional support to patients and their family members. To do this effectively in the U.S. health care system, nurses must speak English with a high standard of proficiency. ANA members also include the four Advanced Practice Registered Nurse (APRN) roles: nurse practitioner, certified nurse midwife, clinical nurse specialist, and certified registered nurse anesthetist. ANA is dedicated to partnering with health care consumers to improve practice, policies, delivery models, outcomes, and access across the health care continuum.

Thank you for the opportunity to comment on these updates. If you have any questions, please contact Tim Nanof, Vice President, Policy and Government Affairs, at [tim.nanof@ana.org](mailto:tim.nanof@ana.org) or (301) 628-5166.

Sincerely,



Debbie Hatmaker, PhD, RN, FAAN  
Chief Nursing Officer / EVP

cc: Jennifer Mensik Kennedy, PhD, RN, NEA-BC, FAAN, ANA President  
Loressa Cole, DNP, MBA, RN, NEA-BC, FAAN, ANA Chief Executive Officer

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<sup>4</sup> *Commission on Graduates of Foreign Nursing Schools International*. Available at: <https://www.cgfns.org/>.