

September 1, 2021

The Honorable Xavier Becerra
Secretary
Department of Health and Human Services
Hubert H. Humphrey Building, Room 509F
200 Independence Avenue SW
Washington, DC 20201

Dear Secretary Becerra:

On behalf of the American Nurses Association (ANA), I write to urge robust and immediate action to address the unsustainable nurse staffing shortage facing our country. Nurses have remained steadfast on the front lines since the beginning of the pandemic, while overcoming challenges, risks to their personal health and safety such as limited personal protective equipment and the physical, emotional and mental health burden of the COVID-19 virus. Now, the Delta variant is causing cases to soar, overrunning hospital and staff capacity. These current circumstances have only exacerbated underlying, chronic nursing workforce challenges that have persisted for years. Since the nation began COVID-19 mitigation and response efforts, much focus has been placed on nurses facing shortages of equipment to appropriately care for patients. Now, it is imperative that the Administration acknowledge and take concrete steps to address a more dire shortage: a crisis-level human resource shortage of nurses that puts our ability to care for patients in jeopardy.

ANA is deeply concerned that this severe shortage of nurses, especially in areas experiencing high numbers of COVID-19 cases, will have long-term repercussions for the profession, the entire health care delivery system, and ultimately, on the health of the nation. **To address this crisis and to ensure that we have a strong nursing workforce for the future, ANA urges the Administration to declare a national nurse staffing crisis and take immediate steps to develop and implement both short- and long-term solutions.**

Shortages of nursing staff are being reported across the country:

- Mississippi has reported that it has seen a decrease of 2,000 nurses since the beginning of 2021.
- Hospitals in Tennessee are operating with 1,000 fewer staff than at the beginning of the pandemic, prompting them to call on their National Guard for reinforcements.¹
- Texas is recruiting 2,500 nurses from outside the state, a number that still will fall short of expected demand.²

¹ Guenot, M. (2021, August 18). *Hospitals in states struggling With COVID-19 are facing severe staff shortages due to burnout, with 2 SAYING patient beds are going unused.* Business Insider. <https://www.businessinsider.com/hospitals-staff-shortages-pandemic-burnout-2021-8>.

² Ibid.

- Louisiana had over 6,000 unfilled nursing positions open across the state before the Delta variant caused a surge in cases.³ This shortage may become more acute as the state deals with the aftermath of Hurricane Ida.
- To address workforce challenges, Nebraska is recruiting unvaccinated nurses.⁴
- According to a survey from [Trusted Health](#), the COVID-19 pandemic has caused **39%** of nurses ages 20 – 39 to report that their commitment to nursing had decreased.

The current nursing shortage is not one that nurses alone can solve. As such, it is crucial that the Administration mount a whole of government approach by convening nurses, hospitals, physicians, other health care personnel, state and federal government officials, and key stakeholders to examine, identify, and then implement real solutions to nursing shortages, including:

- 1) Addressing the current fatigue and mental wellbeing of nurses
- 2) Developing strategies to retain the current nursing workforce
- 3) Working with CMS to adopt new payment methodologies that recognize the value that nurses bring to patient care
- 4) Removing barriers to practice faced by nurses
- 5) Addressing the persistent barriers that limit the number of qualified nursing students that can be educated each year
- 6) Building and maintaining a resilient workforce to meet our country's current and future health care needs.

Enclosed please find an initial outline of ANA's proposed policy solutions to address the nurse staffing crisis that we hope will help form the foundation of conversations convened by HHS on this topic.

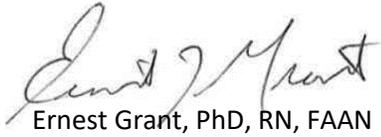
ANA is the premier organization representing the interests of the nation's over 4 million registered nurses (RNs), through its state and constituent member associations, organizational affiliates, and individual members. ANA members also include the four advanced practice registered nurse roles (APRNs): nurse practitioners (NPs), clinical nurse specialists (CNSs), certified nurse-midwives (CNMs), and certified registered nurse anesthetists (CRNAs). 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.

³ Chavez, R. (2021, August 27). Surgery by DAY, Bedpans at night: Staffing shortages in Louisiana HOSPITALS mean some workers pull double duties. PBS. <https://www.pbs.org/newshour/health/surgery-by-day-bedpans-at-night-staffing-shortages-in-louisiana-hospitals-mean-some-workers-pull-double-duties>.

⁴ Salcedo, A (2021, August 25) Some Nebraskans outraged at state's recruiting ad for unvaccinated nurses; "It feels insulting to the profession". Washington Post. <https://www.washingtonpost.com/nation/2021/08/25/nebraska-nurses-no-covid-vaccination/>

ANA looks forward to continued engagement with HHS as the nation continues to combat the COVID-19 pandemic. Please contact Ingrida Lusi, Vice President, Policy and Regulatory Affairs, at (301) 628-5081 or Ingrid.Lusis@ana.org, with any questions.

Sincerely,



Ernest Grant, PhD, RN, FAAN
President

Enclosure

cc: The Honorable Miguel Cardona, US Secretary of Education
The Honorable Marty Walsh, US Secretary of Labor
Loressa Cole, DNP, MBA, RN, NEA-BC, FACHE, FAAN, ANA Chief Executive Officer
Debbie Hatmaker, PhD, RN, FAAN, ANA Chief Nursing Officer

ANA's proposed policy solutions to address the nurse staffing shortage crisis

HHS Must Convene Stakeholders to Identify Short- and Long-Term Solutions to Staffing Challenges.

ANA urges HHS to convene all stakeholders for a robust discussion of staffing challenges and potential solutions. These challenges are not solely contained within the nursing profession, especially as the health care delivery system continues to evolve towards a more integrated system. As such, it is crucial that the agency convenes, in addition to nurses, hospitals, physicians, other health care personnel, state and federal government officials, and key stakeholders to examine, identify, and then implement real solutions to the nursing shortage. The focus of these discussions must be to identify the current challenges and both short- and long-term solutions. Short-term solutions will allow us to adequately face the demand of the COVID-19 pandemic response. Long-term solutions will ensure the nation's health care delivery system is best equipped to provide quality care for patients and stands ready for the future challenges. *ANA implores HHS to have these critical conversations and stands ready to work with the agency to facilitate them.*

HHS must work with CMS to take steps to appropriately acknowledge nurses in reimbursement methodologies, ensuring payment equity for nursing services provided to patients.

The COVID-19 pandemic response has made clear that APRNs and RNs are indispensable to providing the care that patients need now and in the future. For instance, APRNs are a significant source of primary care, especially in rural and underserved areas. Further, RNs are responsible for a wide array of direct care and care coordination services in community settings as well as hospitals and long-term care facilities. These health care services are key in ensuring access to care, a critical aspect of addressing health inequity. However, there must be parity in how these vital services are reimbursed.

Recognition through appropriate payment for nursing services is critical in ensuring a resilient nursing workforce ready and able to meet future needs. It is long overdue for nursing services to be separated from "room and board," as currently considered by the Medicare program. Nurses provide vital services to patients across the care continuum and the health care delivery system must recognize their critical role through appropriate reimbursement. **ANA urges HHS to work with CMS to consider methodologies and approaches that will ensure payment equity for nursing services.**

In light of the rise of Coronavirus variants and increased COVID-19 contraction, HHS must provide additional resources including recruitment and retention incentives and support to bolster the nursing workforce to meet current demands for critical health care services.

Hospitals are quickly reaching capacity limits due to the surge of COVID-19 cases and the nursing shortages across the country. It is imperative that HHS continue its thoughtful pandemic leadership and utilize all available authorities to address this issue. Nurses are still in need of resources to combat the pandemic and ANA continues to call on the Administration to act in response. Standing on the front lines, our nation's nurses are becoming increasingly burned out as the pandemic continues to weigh heavily on them. We are seeing large numbers of nurses leaving the profession as a result. This only results in further strain on the nursing workforce, which was already in a supply crisis before the pandemic.

ANA appreciates the Administration's thoughtful pandemic response to date through issuance of waivers and other resources to bolster nurses' ability to provide vital health care services amid the challenges faced by the health care system.

ANA urges HHS to remove unnecessary regulatory barriers to APRN practice

In various ways, certain Medicare payment rules restrict APRN practice above and beyond their state scope-of-practice rules. Examples include unnecessary supervision requirements, as well as payment restrictions for certain Medicare services provided by APRNs. Such restrictions limit access to care and beneficiaries' choice of qualified provider. Several of these federal practice restrictions have been waived during the COVID-19 public health emergency (PHE). As experiences resulting from these waivers demonstrate, allowing APRNs to practice to the full extent of their state license translates to needed system capacity and expanded access for patients. *We continue to call on CMS to grant permanent regulatory relief for APRN practice, so that access is not constricted when the PHE ends.*

HHS must continue to educate the nation on the importance of the COVID-19 vaccine and provide support and resources for widespread administration of the vaccine and any subsequent boosters.

Vaccines are critical to the control and prevention of infectious disease transmission. Nurses play a critical role in educating the public and fellow health care colleagues, as well as in the administration of COVID-19 vaccines. Currently, the nation faces significant vaccine hesitancy while cases of the Delta variant increase rapidly, straining an already strained nursing workforce. HHS must continue to provide resources and support efforts to educate the public on the importance of getting the COVID-19 vaccine.

In addition, it was recently announced that boosters for the already vaccinated will be available. HHS must provide the necessary resources to states and localities for successful distribution and administration of the booster vaccine doses. The agency must also educate the public on the importance of receiving the booster doses, when appropriate. The vaccine is an important component of COVID-19 mitigation efforts—especially in an effort to keep patients out of hospitals facing capacity challenges. *ANA urges HHS to provide support and resources for continued education and ongoing distribution and administration of the vaccine across the country.*

HHS must ensure a resilient nursing workforce that meets current and future staffing demands and ensures access to care for patients.

Prior to the COVID-19 pandemic, nurses already experienced tremendous levels of stress in their day-to-day work. The pandemic has further intensified the feelings of exhaustion, anxiety and being overwhelmed especially with respect to patients that are dying and having to inform and comfort their surviving family members. It is vital the nation prioritizes the mental health of nurses and other health professionals who are caring for our most vulnerable patients. ANA actively advocates to reduce stigma around seeking help for mental health and substance use disorders for health professionals as well as their patients.

Moreover, nurses also must be treated and compensated appropriately as they provide care under extraordinary circumstances, so that the next generation is encouraged to enter the field and ensure the nation's readiness for public health emergencies. Appropriate compensation ensures that the health care delivery system retains the nurses needed to provide care to patients. We are seeing examples throughout the country of nurses leaving their communities for the higher compensation offered by travel nurse agencies. This only serves to further local staffing strains, often in the most underserved communities.

However, a resilient workforce is achieved not only by adequate pay, as the working environment must also allow nurses to flourish in their profession. Nurses are professionals providing critical health care services to patients—they should not have to fight for allotted breaks and other challenges created by

antiquated views of the profession. All too often, we hear of staffing plans not being enforced, resulting in long shifts and strains on nurses providing care. Nurses know best the provisions that they and their team need, from patient complexity to layout of the nursing unit. This is just another instance where health care delivery and outcomes would be improved by greater nurse involvement. It is crucial for nurses to take on leadership roles, in all settings, to meet the demands of our ever-changing health care system, including being permitted to practice to the full extent of their education, training and licensure.

Lastly, the introduction of electronic health records (EHR) has proved to be burdensome, detracting from patient-centered care. Documentation and required recording of various questions is time consuming, which leaves less time for nurses to connect with patients. HHS should reevaluate current and future requirements and ensure the right balance is struck between the positive impact of EHR in comprehensive, coordinated care and provider burden.

To ensure a future workforce that meets all the needs and demands of patient care, it is crucial that we not only attract students to the nursing profession but retain skilled nurses throughout their careers. Effective workforce planning and policymaking require better data collection and an improved information infrastructure. [ANA encourages HHS to work with nurses to identify approaches to bolstering a resilient nursing workforce ready to meet the demands of today and tomorrow's health care delivery system.](#)