

May 6, 2020

The Honorable Thomas Engels
Administrator
Health Resources and Services Administration

Dear Administrator Engels:

On behalf of the undersigned organizations, we write to express serious concern regarding HRSA's implementation of the Mental Health and Substance Use Disorders Workforce Training Demonstration, which was authorized under Section 9022 of the *21st Century Cures Act* (P.L. No. 114-255) and recently appropriated funding under the *Further Consolidated Appropriations Act, 2020* (P.L. No. 116-94). While Congress expressed its clear intent through both the program's authorization and pertinent appropriations reports that the Mental Health and Substance Use Disorders Workforce Training demonstration support interprofessional training, the current administration of the program suggests that HRSA will fall short of this direction.

We are acutely concerned about the impact that HRSA's administration of this demonstration will have in the midst of the current COVID-19 pandemic. As a result of direct challenges to respiratory health, the National Institutes of Health (NIH) has indicated that individuals suffering from substance use disorders are particularly vulnerable to COVID-19 infection and related complications. In addition, continued efforts to contain COVID-19 through social distancing measures pose unique challenges for individuals in treatment and/or recovery for substance abuse, who are often heavily reliant on face-to-face health care delivery. As the demand for mental and behavioral health services is expected to significantly increase as the result of the COVID-19 pandemic, clinical training opportunities for health professions students across disciplines have been significantly reduced in an effort to preserve limited personal protective equipment and increase the capacity of practicing providers. It is critical that federal investments like those in the Mental Health and Substance Use Disorder Workforce Training Demonstration support the clinical training of interprofessional care teams necessary to mitigate the impact of COVID-19.

Prior to the beginning of the COVID-19 pandemic, the need for increased training opportunities in behavioral health for interdisciplinary care teams had already been critical. In 2016, Congress authorized the Mental Health and Substance Use Disorders Workforce Training Demonstration to bolster training of this vital workforce in response to the mounting opioid epidemic and in recognition of the Nation's increasing shortage of mental and behavioral health providers. Section 9022 of the *21st Century Cures Act* authorized an interprofessional demonstration program to award grants to entities providing training opportunities to a broad array of future providers (e.g., medical residents and fellows in psychiatry and addiction medicine, as well as nurse practitioners (NPs), physician assistants (PAs), social workers, and health service psychologists) of mental health and substance use disorder services in underserved, community-based settings.

Within the total for Behavioral Health Workforce Education and Training, \$26.7 million was appropriated for the Mental Health and Substance Use Disorders Workforce Training Demonstration in the *Further Consolidated Appropriations Act, 2020*. The accompanying

Explanatory Statement directed that this funding be used to establish the Mental Health and Substance Use Disorders Workforce Training Demonstration “as authorized under section 9022 of the 21st Century Cures Act (P.L. 114-255) and described in House Report 116-62.”

House Report 116-62 requires that “[t]his program will make grants to institutions including but not limited to medical schools and FQHCs to support training for medical residents and fellows in psychiatry and addiction medicine, as well as nurse practitioners, physician [assistants], and others, to provide SUD treatment in underserved communities.”

HRSA’s FY 2021 Justification of Estimates for Appropriations Committees provides that “[i]n FY 2020, HRSA anticipates making \$26.7 million in awards for the [Addiction Medicine Fellowship] program,” which seeks to increase the number of board-certified addiction medicine and addiction psychiatry specialists trained in providing interprofessional behavioral health services. This justification further provides that “HRSA anticipates making \$3 million in additional awards above those made in FY 2020 to support Mental Health and Substance Use Disorders (SUD) Workforce Training Demonstration to expand the number of fellows trained as addiction medicine specialists and to increase the number of providers that serve in underserved, community-based settings.”

While an important element of the Demonstration is to increase the number of physician board-certified addiction medicine and addiction psychiatry specialists, HRSA’s FY 2021 Justification of Estimates suggests that the entire \$26.7 million appropriated for the Demonstration may be used solely in support of these providers. This interpretation is further bolstered by the Notice of Funding Opportunity published by HRSA which identifies eligible applicants as “sponsoring institutions of accredited addiction medicine fellowship programs or accredited addiction psychiatry fellowship programs, or a consortium consisting of at least one teaching health center and one sponsoring institution of an addiction medicine or [addiction] psychiatry fellowship program.” This result would contravene Congress’ intent both in authorizing the Mental Health and Substance Use Disorder Workforce Training Demonstration in the *21st Century Cures Act* and appropriating funding for the demonstration in the *Further Consolidated Appropriations Act, 2020*. Congressional intent was clear that the Mental Health and Substance Use Disorders Workforce Training Demonstration is to award grants to entities providing training opportunities to an expanded group of future providers in recognition of the clinical value of interprofessional, team-based care.

We request that you provide a more detailed explanation clarifying how HRSA intends to administer the Mental Health and Substance Use Disorders Workforce Training Demonstration, both in FY 2020 and beyond, in order to ensure that this Demonstration provides the robust support for training of the entirety future mental and behavioral health workforce, including NPs, PAs, social workers, and health service psychologists.

Sincerely,

American Academy of PAs
American Association of Colleges of Nursing
American Association of Nurse Practitioners
American Psychological Association

Council on Social Work Education
National Association of Deans and Directors of Schools of Social Work
National Association of Social Workers
Physician Assistant Education Association