September 11, 2020

Cynthia Harne  
Chief, Medical Training and Geriatrics Branch  
Division of Medicine and Dentistry  
Bureau of Health Workforce  
Health Resources and Services Administration  
5600 Fishers Lane  
Rockville, Maryland 20857

Dear Ms. Harne:

On behalf of the Physician Assistant Education Association (PAEA), which represents all 260 accredited PA programs graduating more than 10,000 new PAs each year, we are writing in response to the forecasted Notice of Funding Opportunity for HRSA’s new Integrated Substance Use Disorder Training Program (ISTP). PAEA applauds the work that HRSA has undertaken to develop this competition, which recognizes the value of a multidisciplinary workforce to expanding access to care for patients suffering from substance use disorders. As the agency implements this program, we are fully committed to serving as a resource to ensure it successfully achieves its aim of supporting the training of a high-quality behavioral health workforce.

As the full Notice of Funding Opportunity is developed, we request the inclusion of explicit language clarifying that academic programs that train students from the identified professions are eligible lead applicants as “entities with a demonstrated record of success in providing training for nurse practitioners, physician assistants, health service psychologists, and social workers.” We further request that awarded applicants be required to provide training opportunities for all of the previously listed applicants in alignment with congressional intent.

The impetus for the authorization of the ISTP as a component of the 21st Century Cures Act was, in part, the difficulty that health professions education has faced in securing clinical training experiences in behavioral health for students. A 2015 PAEA report found that nearly 50% of PA programs reported that
it is either difficult or very difficult to secure clinical training sites in mental/behavioral health settings for PA students.¹

In recognition of these challenges, House Report 116-450, accompanying H.R. 7614, recently included language regarding the inclusion of academic programs as recipients of ISTP funding in fiscal year 2021, stating:

“Within the total, the Committee includes an additional $15,000,000 for new grants to expand the number of nurse practitioners, physician assistants, health service psychologists, and social workers trained to provide mental and substance use disorder services in underserved community-based settings that integrate primary care and mental and substance use disorder services, which may include establishing, maintaining, or improving academic units or programs to support those activities, as authorized under section 760 of the PHS Act.”

As the Notice of Funding Opportunity is developed for this competition, we encourage you to leverage the opportunity to improve training opportunities in underserved behavioral health settings for PA, nurse practitioner, social worker, and health service psychologist students by clarifying that academic programs may serve as lead applicants.

We welcome the opportunity to discuss these and other behavioral health workforce development issues in greater depth. Should you have any specific questions, or if you would like additional information, please contact PAEA Director of Government Relations Tyler Smith at 703-667-4356 or tsmith@PAEAonline.org.

Sincerely,

Howard Straker, EdD, MPH, PA-C
President

Mary Jo Bondy, DHEd, MHS, PA-C
Chief Executive Officer