

September 18, 2020

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Associate Administrator for  
Health Workforce  
Director, National Health Service Corps  
HRSA  
5600 Fishers Lane  
Rockville, MD 20857

Diane Fabiyi-King  
Designated Federal Official  
National Advisory Council on the National  
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HRSA  
5600 Fishers Lane  
Rockville, MD 20857

Dear Dr. Padilla and Ms. Fabiyi-King:

On behalf of our respective memberships, we are writing in response to recent eligibility changes for the National Health Service Corps (NHSC) Students to Service program. The American Academy of PAs represents more than 140,000 practicing PAs across the United States, and the Physician Assistant Education Association represents the 260 accredited PA programs nationally, which graduate over 10,000 students each year. Throughout the continuum of PA education and practice, both of our organizations are committed to improving access to care in rural and underserved areas by utilizing federal workforce development programs such as the NHSC as a crucial incentive for our members and students.

For decades, PAs and PA students have played a vital role in addressing health professional shortages as participants in the NHSC scholarship and loan repayment programs. Under Medicare and other healthcare programs, PAs are one of three health professional groups, along with physicians and advanced practice registered nurses, that are consistently recognized as providers of primary care services. As of September 2019, PA students and graduates represented approximately 10% of the NHSC student pipeline and field strength respectively.<sup>1</sup> However, while PAs and PA students are currently able to participate in the largest NHSC programs administered by HRSA, the Students to Service program had previously been restricted to medical and dental students. In recognition of the value of care provided by advanced practice clinicians in rural and underserved settings, this program was recently expanded to include nurse practitioner and certified nurse midwife students; however, we were disappointed by the exclusion of PA students for this funding cycle. **Based upon both the needs of patients in underserved communities and the unique contributions of PAs to the health of rural communities, we urge you to further expand eligibility to PA students for this and future funding cycles.**

In response to growing workforce shortages in rural areas, PA education has placed increasing emphasis on the recruitment of students from rural communities as a means of further expanding access to care. According to a recent survey of PAEA's membership, 22% of PA programs currently include high rates of rural practice by their graduates as a component of

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<sup>1</sup> Health Resources and Services Administration. (2020). Justification of Estimates for Appropriations Committees. Retrieved from: <https://www.hrsa.gov/sites/default/files/hrsa/about/budget/budget-justification-fy2021.pdf>.

their mission while 20% have instituted a formal admissions preference for students from rural areas.<sup>2</sup> Due in part to these policies, 42% of first-year PA students now report having spent some portion of their early lives in a rural community, a key indicator of their likelihood to practice in a rural area following graduation.<sup>3</sup> **To ensure that PA students are further incentivized to provide care in rural areas, we believe it is critical that they have equal access to federal loan repayment opportunities such as the NHSC Students to Service program.**

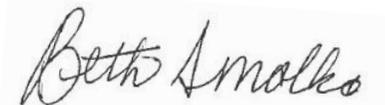
Beyond the scope of PA education, practicing PAs play a critical role in rural care delivery. According to a recent telephone survey conducted by the Medicare Payment Advisory Commission, more than 40% of Medicare beneficiaries reported seeing a PA or NP for some of their primary care with rural beneficiaries being more likely to report seeing a PA or NP for all or most of their primary care.<sup>4</sup> Further, in recognition of the increased propensity of advanced practice providers to practice in rural areas, federally-designated service delivery sites like rural health clinics have PA and NP staffing requirements to ensure patients have access to the providers most likely to practice in their communities. **Full access to federal incentives such as the Students to Service program is critical to ensure that these and other facilities meet these staffing requirements, and, as such, we urge you to expand eligibility to PA students for this and upcoming funding cycles.**

We welcome the opportunity to discuss this issue 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](mailto:tsmith@PAEAonline.org) or AAPA Vice President for Federal Advocacy, Tate Heuer, at 571-319-4338 or [theuer@aapa.org](mailto:theuer@aapa.org).

Sincerely,



Howard Straker, EdD, MPH, PA-C  
President  
Physician Assistant Education Association



Beth Smolko, DMSc, MMS, PA-C  
President and Chair of the Board  
American Academy of PAs

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<sup>2</sup> Physician Assistant Education Association. (2019). By the Numbers: Curriculum Report 4: Data from the 2018 Prerequisite Curriculum Survey. Retrieved from: <https://paeaonline.org/wp-content/uploads/2019/12/cr4-report-20191210.pdf>.

<sup>3</sup> Physician Assistant Education Association. (2020). By the Numbers: Student Report 4: Data from the 2019 Matriculating Student and End of Program Surveys. Retrieved from: <https://paeaonline.org/wp-content/uploads/2020/08/student-report-4-updated-20200821.pdf>.

<sup>4</sup> Medicare Payment Advisory Commission. (2020). Report to the Congress: Medicare Payment Policy. Retrieved from: [http://medpac.gov/docs/default-source/reports/mar20\\_entirereport\\_sec.pdf?sfvrsn=0](http://medpac.gov/docs/default-source/reports/mar20_entirereport_sec.pdf?sfvrsn=0).