



American Association
of Colleges of Nursing

April 19, 2007

Susan G. Queen, Ph.D.
Health Resources and Services Administration Reports Clearance Officer
Room 10-33
Parklawn Building
5600 Fishers Lane
Rockville, MD 20857

Dear Dr. Queen:

On behalf of the American Association of Colleges of Nursing (AACN), I would like to thank the Health Resources and Services Administration (HRSA) for allowing us the opportunity to respond to the Federal Register Notice (72 FR 8758) regarding the Annual Operating Report (AOR) Form for the Nursing Faculty Loan Program (NFLP). AACN represents over 600 schools of nursing and serves as the national voice for America's baccalaureate- and higher-degree nursing education programs. Together, these institutions produce about half of our nation's registered nurses and all of the nurse faculty and researchers.

According to AACN's report on *2006-2007 Enrollment and Graduations in Baccalaureate and Graduate Programs in Nursing*, U.S. nursing schools turned away 42,866 qualified applicants due to an insufficient number of faculty, clinical sites, classroom space, clinical preceptors, and budget constraints. Almost three quarters (71%) of the nursing schools responding to the survey pointed to faculty shortages as a reason for not accepting all qualified applicants into nursing programs. As you are aware, the NFLP increases the number of qualified nurse faculty by creating a student loan fund within individual schools of nursing. This program not only addresses the nationwide shortage of faculty, but is essential in building a diverse and specialized pool of expert faculty who will educate the next generation of nurses. Therefore, AACN appreciates the opportunity to respond to FR 8758.

The following document includes responses compiled from 20 of our member schools across the country. These schools shared their opinion regarding the AOR form for the NFLP as well as information that may be helpful to HRSA should changes be made to the program's implementation. Thank you again for the opportunity to respond to this notice. Should you have any questions or require additional information, please do not hesitate to contact my staff, Suzanne Begeny, at (202) 463-6930, extension 247.

Sincerely,

Geraldine "Polly" Bednash, PhD, RN, FAAN
Executive Director

ADVANCING HIGHER EDUCATION IN NURSING

**Summary of Responses to Federal Register Notice (72 FR 8758)
The Nurse Faculty Loan Program (NFLP): Annual Operating Report (AOR) Form**

AACN Member Schools Responding:

Bethel College
Case Western Reserve University
Concordia University Wisconsin
Indiana University-Purdue University Indianapolis
Indiana Wesleyan University
Minnesota State University Moorhead
Ohio State University
Oregon Health and Science University
Rutgers, The State University of New Jersey
University of California, San Francisco
University of Illinois at Chicago
University of the Incarnate Word
University of Massachusetts Worcester
University of Mississippi Medical Center
University of Missouri-St Louis
University of San Diego
University of South Florida
University of Texas at Arlington
University of Texas Health Science Center at San Antonio
Villanova University

General Comments Regarding the NFLP

- The NFLP is essential to building faculty, which is a major reason for capacity issues at our school of nursing.
- The NFLP has provided a much-needed and appreciated source of funding for students in our master's and doctoral programs. We have had no trouble recruiting students for the loan program.
- The NFLP has been particularly useful in helping many of our students go to school full-time, which in turn helps them complete their degree and enter the workforce more quickly.
- This program is critical to sustaining our doctoral students in full-time study and thereby shortens their time-to-degree. Otherwise, they end up attending school part-time and prolonging their move into faculty roles. We could fund more students, especially with the advent of the Doctor of Nursing Practice program.
- I strongly believe the NFLP is an excellent program that students can take advantage of. It does require students to attend full-time and be ready to enter the faculty workforce.
- We are in the second year of funding and the students have truly benefited from the program. Many would not have considered pursuing a doctorate without this funding.
- The NFLP is urgently needed by our nursing program because our institution offers very few graduate assistant positions and most of those positions do not offer tuition waivers with them. Graduate nursing students, therefore, have very few options for financial assistance for their education. The nurse educator track is currently our most

- popular track, and we have capacity to admit additional students. I'm certain that greater assurance of financial assistance would recruit more applicants to our program.
- Collecting the data required in the AOR form will help to understand the impact of the program.

Comments Regarding the AOR Form

Effort Needed to Complete the AOR Form

- Not burdensome
- Not burdensome
- Not burdensome
- Not onerous
- Not burdensome
- The data that would be required by the new Annual Operating Report Form is reasonable and would not be difficult for us to collect. We would be willing to provide additional information as requested if it would ensure the continuation of the program.
- Not burdensome
- The annual operating form I believe is a manageable form.

Institutional Difficulties May Delay the Completion of the AOR Form

- Since the labor involved in collecting the data involves two offices, Financial Aid and my college, I would suggest enough time be allotted to complete the report. Also, an electronic, online system proves to be most efficient, rather than paper.
- NFLP is administered by the university's financial aid office, and it has been a bit cumbersome.

Additional Data Points to Collect in the AOR Form

- It would be beneficial to know if schools have not expended their NFLP funds. This would help determine whether the funds not expended could be re-distributed to schools that have applied.
- It would be beneficial if the NFLP could further outline what is reasonable deferment.

AOR Form and the Reporting Cycle

- The NFLP is on a different reporting system than other HHS programs. It would be easier if all of the reporting was done at the same time.

Suggested Implementation Changes for the NFLP

Late Identification of the NFLP Notice

- One suggestion that would help us in implementing the program and disbursing the funds, is to receive the award notification in advance of the start of the academic year. For example, we typically receive award notification from other federal programs (Department of Education's GAANN, HRSA's Advanced Education Nursing Traineeship Program) by July 1 of every year, and this earlier notification allows us to identify the most qualified recipients for the funding, and it allows the recipients enough time to determine their program of study for the year.
- Our university wrote a grant requesting funding for the first time in the fall of 2005. Our first funding came in fall of 2005 for \$54,000. Because we were so late in

receiving the notice (our semester begins in August), we had only three students who were able to start the semester under this program in the spring of 2006. However, I recruited five additional students for the 2006 fall semester thinking our grant would be renewed. Because we had about half the funding left, we were not renewed (although we were told we would be able to carry over the first year). Four of the eight additional students dropped the program since they were not funded. The remaining student from the five new recruits never received funds but instead chose to take one course at a time since this is all she could afford. That left the three students who originally started and never finished the program because of the cost. They are taking one course at a time and only received enough for one semester as well as a few courses next semester. I have not and will not reapply for this program since we were not refunded and had students left stranded.

- One major problem encountered with this program is the late award of funds. We did not receive the award until after tuition payments were due. Therefore students had to pay the first semester of tuition and did not have any assurance of receiving the loan for the next semester. This did not allow them to develop a very sound financial plan for their education. The lateness of the award, and the uncertainty of even receiving it, discouraged prospective applicants from applying. This resulted in only one loan application being received, and our institution did not expend the full amount of the loan by June 30, 2006. This made our institution ineligible for receiving additional funds in the next round of awards. An application was made anyway and, of course, it was denied. The remainder of the funds was fully expended for the fall 2006 term, but because the 2006 loan award application was denied, there is no additional money to continue to support the loan applicants. It appears that the problem will repeat itself because the HRSA NFLP application for 2007 is still not available. I understand that it will become available in the next 2-3 weeks.

Part-time Restrictions for NFLP Funds

- The majority of our nursing students are part-time students who need the funds. These students could progress more quickly if they had funding.
- The biggest problem that I have is that the funds are available only for those going full-time. This has been a major problem for us as the vast majority of our students are part-time, so this year I have much money left over.
- The fact that it can only be awarded to full-time students is a bit of a weakness, as those who are enrolled part-time need support as well.
- The difficulty I find is recruiting students willing to go full-time. I was only able to recruit five. In our PhD program it is relatively easy to stay full-time during course work but not as easy at dissertation.

Amount of Effort Exerted in the NFLP Grant Request

- A significant amount of time was exerted in preparing the grant request.
- Completing the grant request takes a significant amount of time.

Disadvantage of Small NFLP Awards

- Due to existing commitments to other schools and students, we were awarded a small NFLP grant.
- We will need to share the NFLP resources with both programs this next year and the funds are already stretched pretty thin.

Difficulties for Private Institutions with the NFLP

- Our school has to cover 1/9 of the money for the NFLP, which is difficult in smaller private schools. The program is good. It is meeting its mission. As one student said “I needed to do it because we had to buy hay this year.” She’s a farmer’s wife and money was tight this year. She will be an excellent faculty member. She has a servant leader heart and cares a great deal about students. She is currently working as a part-time faculty member and has applied for a full-time position for next fall after she graduates. It seems counter productive to me to cut the program when we need faculty members in many areas. My institution is working to expand our nursing programs to meet the demand and will need more well prepared faculty members. The NFLP prepares people with a different perspective than advanced practice nurses. They teach differently and I think better.