January 20, 2022

John J. Howard, MD, MPH, JD, LLM, MBA
Director
National Institute for Occupational Safety and Health
Centers for Disease Control and Prevention
Department of Health and Human Services
395 E Street SW, Suite 9200
Washington, DC 20201

Re: Centers for Disease Control and Prevention, HHS Interventions to Prevent Work-Related Stress and Support Health Worker Mental Health; Request for Information [Docket No. CDC–2021–0106; NIOSH–344

Dear Dr. Howard,

The American Association of Critical-Care Nurses (AACN) is pleased to respond to the National Institute for Occupational Safety and Health (NIOSH) request for information on interventions to mitigate stress and support well-being in our healthcare workforce. As the organization representing the interests of our nations' 500,000 acute and critical care nurses, we know firsthand that emotional and physical exhaustion, anxiety, depression, posttraumatic stress disorder, and moral distress are ubiquitous threats to the sustainability of our healthcare system. The well-being of each individual healthcare team member contributes to the U.S. healthcare system's capacity to deliver the care required by vulnerable patients.

To understand the needs of our specific population, we look to a survey done by the American Nurses Foundation September 2021 and examine the responses of the 2574 nurses working in acute care settings. 45% of that portion of the sample identified as "not emotionally healthy" or "not at all emotionally healthy," as compared to 34% of the total respondents. In addition, 27% of the acute care subgroup reported an intent to leave

their position in the next six months. The top reasons provided for the intent to leave were impact of their job on their mental health (53%) and insufficient staffing (51%).

We must use evidence informed strategies to address the well-being of healthcare professionals. We also know that focusing exclusively on individual well-being will not resolve the mental health crisis and the resulting attrition among healthcare professionals. System-level interventions are crucial to address the well-being of our healthcare workforce. For this reason, we ask that, in addition to the strategies outlined by the American Nurses Association, NIOSH also consider the following strategies to address the current state of the healthcare workforce.

Provide Resources, Incentives and Guidance to Improve the Health of the Work Environment

We must address healthcare work environments. In 2005, AACN prioritized the health of the work environment as part of our mission to support acute and critical care nurses as we saw that factors outside of knowledge and skills were affecting their ability to provide optimal care. Our evidence-based resource, the *AACN Standards for Establishing and Sustaining Healthy Work Environments* offers nurses and their colleagues a framework for addressing the relational aspects of their professional roles. The six Healthy Work Environment (HWE) standards are: skilled communication, true collaboration, effective decision-making, meaningful recognition, appropriate staffing, and authentic leadership. These standards are interrelated and address a diverse range of behaviors that directly influence how healthcare teams interact with each other and the patients they serve.

For the past 17 years, AACN has conducted research at regular intervals and offered educational content to support implementation of the standards. Our 2018 survey demonstrated an implementation gap. Nurses in hospital units that implemented the HWE standards reported significantly lower rates of intent to leave and moral distress, fewer incidents of violence, and higher perceived quality of care and staffing levels (see Figure).

HWE Implementation Gap

	HWE Standards Implemented PERCENTAGE OF SURVEY RESPONSES	HWE Standards Not Implemented PERCENTAGE OF SURVEY RESPONSES
Quality Patient Care	66%	37%
Appropriate Staffing in Their Unit	58%	33%
Intend to Stay in Their Position	61%	41%
Negative Incident in the Last Year	79%	88%
Experience Moral Distress	24%	39%

Figure: Data excerpted from Ulrich B, Barden C, Cassidy L, Varn-Davis N, "Critical Care Nurse Work Environments 2018: Findings and Implications," Crit Care Nurse, 2019;9(2):67-84. doi: 10.4037/ccn2019605.

Healthcare leaders who invest in implementation of the Healthy Work Environment standards or similar strategies to improve working conditions can more effectively address the well-being of frontline health care professionals. AACN also offers a free assessment tool to serve as a starting point for applying the Healthy Work Environment standards.

Prior to the COVID-19 pandemic, other organizations similarly noted the urgent need to improve the systems in which healthcare is provided. The National Academy of Medicine launched the Clinician Well-Being Collaborative and identified the need for system level change to address rising burnout among healthcare professionals. The Institute for Healthcare Improvement, in moving from "Triple Aim" to "Quadruple Aim" similarly highlighted the need for leaders in healthcare systems to prioritize healthcare professional well-being. These efforts validate the priority we must place on addressing healthcare work environments.

Address the Nurse Staffing Crisis

Our second recommendation is that NIOSH address the nurse staffing crisis. The shortage of nurses contributes to nurse attrition, which further exacerbates the shortage. We urgently need to break this cycle to ensure patient safety, preserve nursing expertise and address the well-being of our workforce. Recurrent surges of admissions due to COVID-19 cause staffing shortages and make it impossible to provide high quality care. This threatens healthcare providers' professional integrity and contributes to mental health challenges.

In collaboration with the American Nurses Association, the American Organization for Nursing Leadership, the Institute for Healthcare Improvement and the Healthcare Financial Management Association, AACN is leading the Partners in Nurse Staffing Task Force. We have assembled a diverse range of stakeholders for a think tank, which will generate recommendations for the Task Force's implementation. We seek NIOSH's support of the recommendations generated by this work.

Include Nurses in Policy and Decision-Making Groups

Our final recommendation is that NIOSH encourage, through policy and by example, the inclusion of nurses in all groups that make decisions about healthcare delivery. Nurses are the largest group of healthcare professionals, with unique expertise and insight into the complexity of patient care. No other profession can represent our perspective. Policies and regulation informed by nurses are much more likely to support the well-being of patients and the innumerable healthcare contributions made by nursing. If at any time, we can assist in providing nurses to serve in policy roles, we stand ready to do so.

Sincerely,

Connie Barden, MSN, RN, CCRN-K, FAAN
Chief Clinical Officer
American Association of Critical-Care Nurses

About the American Association of Critical-Care Nurses: The American Association of Critical-Care Nurses (AACN) is the largest specialty nursing organization in the world with more than 130,000 members. AACN represents the interests of more than half a million acute and critical care nurses and includes more than 200 chapters in the United States.