

November 29, 2021

Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
Hubert H. Humphrey Building
200 Independence Avenue, SW, Room 445-G
Washington, DC 20201

The National Rural Health Association (NRHA) is pleased to offer comments on the Centers for Medicare and Medicaid Services (CMS) COVID-19 Health Care Staff Vaccination Interim Final Rule regulations requiring covered employers to implement and enforce mandatory vaccination policies as a part of President Biden's COVID-19 action plan. We appreciate CMS's continued commitment to the needs of the more than 60 million Americans that reside in rural areas, and we look forward to our continued collaboration to improve health and health care access throughout rural America.

NRHA is a non-profit membership organization with more than 21,000 members nationwide that provides leadership on rural health issues. Our membership includes nearly every component of rural America's health care, including rural community hospitals, critical access hospitals, doctors, nurses, and patients. We provide leadership on rural health issues through advocacy, communications, education, and research.

COVID-19 has ravaged the rural areas throughout the nation. While COVID-19 infections and deaths are declining across the country, rates remain higher in rural areas than in metropolitan ones ([LINK](#)). Over the past two years, rural providers have been put to the test serving on the front lines of the ongoing COVID-19 pandemic. NRHA believes there are ways in which the Administration can make sure rural providers and patients are equipped with the resources they need to combat the remainder of this public health emergency and prepare for the next health crisis.

One of the most pressing issues our rural providers are facing right now is the shortage of healthcare workers. The national shortage of healthcare workers is a widespread and urgent issue impacting the industry as a whole. Since the beginning of the COVID-19 pandemic, many providers, nurses, clinical staff and other employees have left the workforce. This staffing shortage continues to put additional pressure on rural hospitals, including from a financial perspective, as hospitals work to maintain services, bring patients back to their health system and continue providing high-quality care. NRHA expects the challenges around shortages to increase throughout 2022 before they improve. As rural areas face this challenging situation, we are very concerned that the federal vaccine mandate will increase the workforce shortage problem, especially in rural hospitals and rural communities.

NRHA believes it is important for all healthcare workers to be vaccinated, to protect both themselves and the communities they serve. As rural hospitals and other providers work to comply with the CMS rule, the federal mandate is expected to increase the healthcare workforce shortage resulting in service disruptions at the best and some rural hospitals closing or stopping certain healthcare services at the worst.

NRHA asks the US Department of Health and Human Services to consider the following strategies to combat potential rural workforce shortages:

- Provide rural communities facing severe workforce shortages, the option of and funding for, testing of non-vaccinated healthcare professionals. The OSHA ETS outlines a weekly COVID-19 testing regimen as an alternative to compulsory vaccination. Rural providers have noted this incongruity and would like this option, at least in the short term, to keep their employees at the bedside. As a transition, testing could be made available as an option for 6-12 months while rural providers educate their employees to the value of getting vaccinated.
- Develop detailed, targeted, and comprehensive rural federal workforce plans to be communicated and implemented to avoid gaps in health care services in rural communities across the country.
- Allocate additional COVID-19 Provider Relief Funds or other relief measures to compensate providers closing healthcare services to comply with this federal mandate.
- Remove preamble text that suggests regulatory violations resulting in civil monetary penalties and Medicare program termination.

Thank you for the chance to offer comments on this interim final rule and for your consideration of our comments. We very much look forward to continuing our work together to ensure our mutual goal of improving quality and access to care. If you would like additional information, please contact Carrie Cochran-McClain at ccochran@ruralhealth.us, or 202-639-0550.

Sincerely,



Alan Morgan
Chief Executive Officer
National Rural Health Association