

Congress of the United States

Washington, DC 20515

October 3, 2022

Director Carla Haddad
Office of Global Health
Health Resources and Services Administration
Department of Health and Human Services
5600 Fishers Lane
Rockville, MD 20857 U.S.A.

Dear Director Haddad,

We applaud the Health Resources and Services Administration (HRSA), Office of Global Health (OGH)'s, recent efforts to update the list of tests and scores used to determine English proficiency for foreign health care workers seeking admission to the U.S.¹ Specifically, we write in support of the updated list of approved testing services and request that HHS work with us to ensure that passing requirements are held to the highest standards to support positive health outcomes and patient safety.

The United States faces dire health care workforce challenges as we endure the third year of the global COVID-19 pandemic. Health care workers have become strained by burnout and working conditions; and the pandemic has only served to exacerbate existing shortages in rural and underserved communities. A National Academy of Medicine study found that 35 percent to 54 percent of American clinicians report at least one symptom of burnout, more than double the amount of burnout found in other fields.²

In response to a stretched domestic health care workforce, the United States has long turned to international health care workers to fill critical gaps. In fact, foreign-born health care workers make up a significant share of our health care workforce across all levels and occupations; and those seeking admission to the U.S. to work in health care occupations must meet various stringent requirements, including demonstrating English proficiency. HRSA's recent announcement to update the list of tests and scores that satisfy the English proficiency requirement will help streamline the process and demonstrates the Administration's commitment to supporting the resiliency of our health care system.

However, it is imperative that accepted scores across different tests meet equivalent standards. We are concerned that there are discrepancies in the scores currently accepted, and lower scores on some tests creates a loophole for health care workers without sufficient levels of English to

¹ "Health Resources and Services Administration Testing Services and Scores for Foreign Health Care Workers To Demonstrate English Proficiency." *Govinfo.gov*, Federal Register, 2 June 2022, <https://www.govinfo.gov/content/pkg/FR-2019-05-13/pdf/2019-09730.pdf>.

² National Academies of Sciences, Engineering, and Medicine. 2019. *Taking Action Against Clinician Burnout: A Systems Approach to Professional Well-Being*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/25521>.

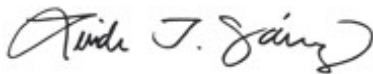
practice in the United States. For example, a higher speaking score is required compared to reading and writing on some tests (i.e., Cambridge, TOEFL IBT, IELTS, OET), whereas for other tests the requirement for speaking is the same as the other skills (i.e., Pearson PTE, MET). This inconsistency means that some health care workers who are accepted will have demonstrated less skill in spoken communication, a critical component in the delivery of care in clinical settings.

Lastly, we also encourage that HRSA takes into consideration changes in the delivery of tests since the 8 CFR 212.15 public hearing held in 2019, as some tests were recently discontinued and their inclusion should be reconsidered.³

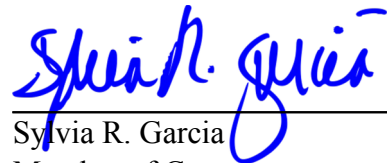
We urge HRSA to take these suggestions into consideration as it makes its interagency recommendations to the Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), where the authority to update this regulation rests.

We appreciate your attention to this matter and look forward to working with you to support efforts to authorize the entry of well-qualified foreign health care workers to the United States to meet our nation's health care needs.

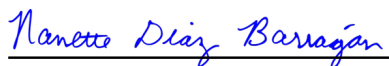
Sincerely,



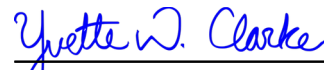
Linda T. Sánchez
Member of Congress



Sylvia R. Garcia
Member of Congress

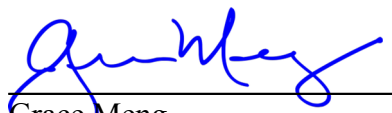


Nanette Diaz Barragán
Member of Congress

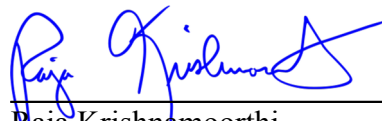


Yvette D. Clarke
Member of Congress

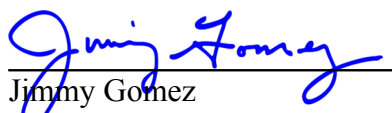
³ "About the Revised TOEFL® Paper-Delivered Test." About the Revised TOEFL® Paper-Delivered Test, ETS, 11 Apr. 2021, <https://www.ets.org/toefl/rpdt/about#:~:text=Effective%20April%2011%2C%202021%2C%20the,years%20after%20the%20test%20date.>



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