

November 4, 2022

Dr. Charles W. Contéro-Puls  
Assistant Commissioner for Student Financial Aid Programs  
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Austin, Texas 78711-2788  
*Submitted electronically via [charles.contero-puls@highered.texas.gov](mailto:charles.contero-puls@highered.texas.gov)*

**Re: Comments on Proposed Rules for the Future Occupations & Reskilling Workforce Advancement To Reach Demand (FORWARD) Loan Program**

Dear Dr. Contéro-Puls:

On behalf of our 475 member hospitals and health systems, the Texas Hospital Association (THA) thanks you for the opportunity to respond to the Texas Higher Education Coordinating Board's proposed rules regarding the new FORWARD Loan Program which seeks to provide students seeking "high-demand credentials" with access to low-interest loans to fund educational expenses. As the healthcare industry, particularly hospitals, faces significant workforce shortages among nurses, physicians, allied health professionals, and various other professions essential to providing quality patient care, we welcome and applaud the Board's creation of this new loan program.

We would like to take this opportunity to recommend that the Board, Texas Workforce Commission, Texas Workforce Investment Council, and the Governor's Office of Economic Development Tourism identify credentials that comprise a hospital's workforce, including but certainly not limited to, nursing and medicine as "high-demand credentials" for the FORWARD loan program.

Hospitals were experiencing significant workforce shortages prior to the pandemic, and it should come as no surprise that the pandemic exacerbated these shortages. Even as COVID-19 is finally showing signs of subsiding, staffing costs and other pandemic-related challenges have led to an unsustainable situation that threatens hospitals' ability to care for Texans. The Health Professions Resource Center of the Texas Department of State Health Services (Center) shows that Texas already had an insufficient supply of registered nurses (RNs) and physicians prior to the COVID-19 pandemic, with a projected deficit of licensed vocational nurses (LVNs) beginning in 2025 and continuing onward.<sup>1</sup> The Center projects the deficit of RNs to grow by 71% between 2023 and 2032, while the deficit of physicians grows by 49%. Over the same period, the state's slight surplus of LVNs will grow into a deficit of over 12,500 LVNs. These numbers may increase given the strain that the COVID-19 pandemic has placed on the healthcare workforce. For example, over the course of the pandemic, the State of Texas was called to provide more than 26,000 staffed positions to health care facilities. Today, hospitals are still scrambling to fill positions with permanent staff, alleviate fatigue, prevent workplace

<sup>1</sup> <https://healthdata.dshs.texas.gov/dashboard/health-care-workforce/workforce-supply-and-demand-projections>

violence, implement retention strategies and pivot staff as the pandemic wanes. Hospitals are braced for winter surges and are already seeing drastic increases in census for pediatric patients suffering from RSV, flu and other respiratory illnesses. Demand for nurses and physicians will continue well beyond the first four years of the FORWARD loan program's existence and it is critical to include health professionals in the program.

THA reiterates hospital support for the Board's creation and future implementation of the FORWARD loan program to help finance student education in high-demand credentials and strongly urges the Board, in consultation with the aforementioned government agencies, to identify healthcare workforce credentials, particularly those required by the hospital inpatient setting, as part of the "high-demand credentials" eligible for the FORWARD loan program.

Respectfully submitted,

/s/ Heather De La Garza

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