

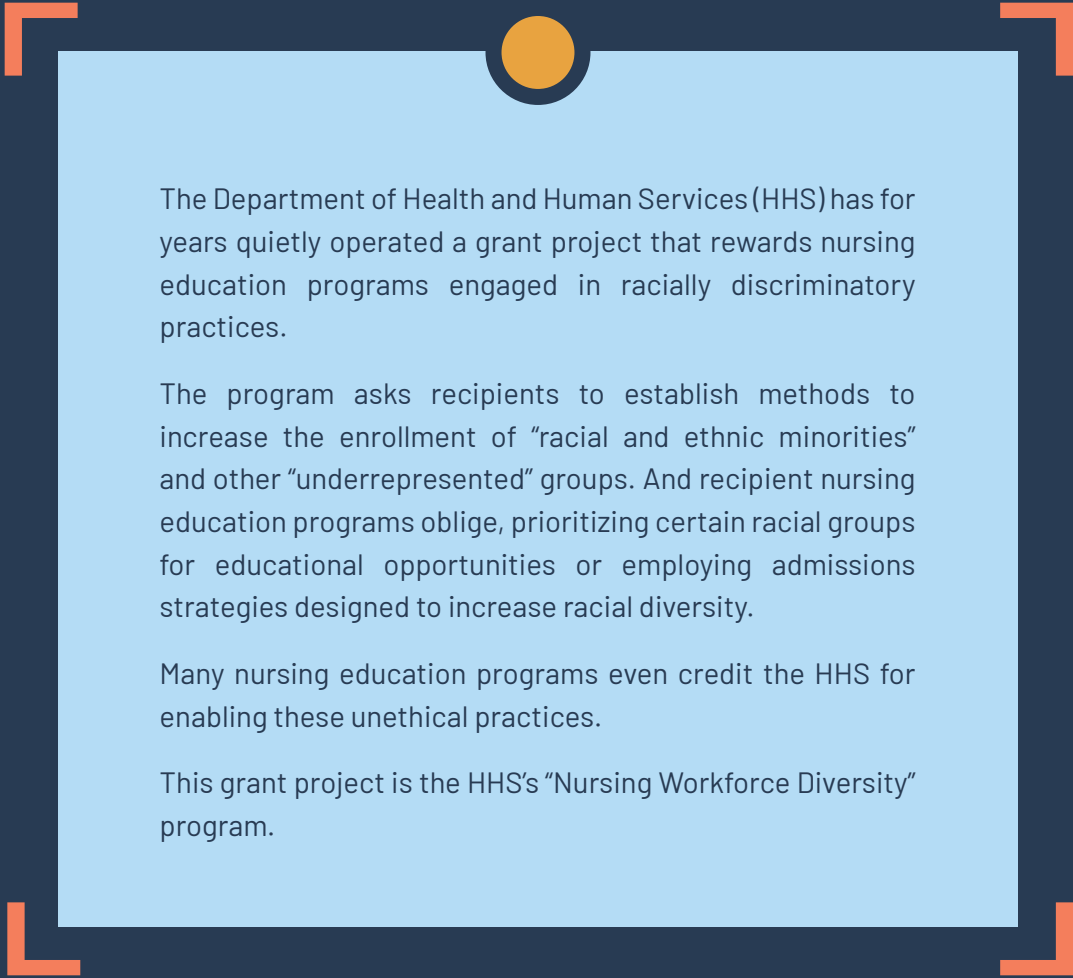


REWARDING DISCRIMINATION: INSIDE HHS'S 'NURSING WORKFORCE DIVERSITY' PROGRAM

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The Department of Health and Human Services (HHS) has for years quietly operated a grant project that rewards nursing education programs engaged in racially discriminatory practices.

The program asks recipients to establish methods to increase the enrollment of “racial and ethnic minorities” and other “underrepresented” groups. And recipient nursing education programs oblige, prioritizing certain racial groups for educational opportunities or employing admissions strategies designed to increase racial diversity.

Many nursing education programs even credit the HHS for enabling these unethical practices.

This grant project is the HHS’s “Nursing Workforce Diversity” program.



EXECUTIVE SUMMARY

The NWD program has been a prolific source of funding for nursing education programs, distributing over \$100 million in grants since 2019.

Nursing programs funded through NWD are required to “implement a comprehensive systems approach that supports the recruitment, enrollment, retention, and graduation of students from disadvantaged backgrounds, including racial and ethnic minorities underrepresented among registered nurses.”

Underrepresented minorities are defined as individuals from the following racial or ethnic groups: American Indian or Alaska Native; Black or African American; Native Hawaiian or Other Pacific Islander; and/or Hispanic.

To achieve these diversity goals, recipient nursing programs engage in conduct that includes overt racial discrimination. Many pledge to employ “holistic admissions,” a strategy that has been used as a roundabout way of practicing race-conscious admissions by downplaying objective metrics of competency in favor of other qualities. Additionally, recipients offer scholarships geared toward or restricted to individuals of certain racial groups.

The University of Cincinnati, for instance, operates a fellowship requiring students to identify as either “American Indian or Alaska native”; “Black or African American”; “Native Hawaiian or other Pacific Islander”; or “Hispanic.” Frontier Nursing University, meanwhile, offers several scholarships targeted toward certain racial groups: one is specifically “designated for underserved students of color,” while another states it is available to students whose “race or ethnicity has been historically underrepresented.”

Moreover, the American Association of Colleges of Nursing (AACN), the chief standards-setting body for nursing education programs, provides technical assistance to NWD-funded institutions as well as workshops for schools implementing holistic admissions to increase diversity in their enrollment.

Taken as a whole, NWD serves as a powerful financial incentive for nursing education programs to engage in discriminatory conduct.



THE PROGRAM

In operation under its current name **since** 2000, NWD has awarded grants to dozens of nursing education programs in states across the country.

The program shells out roughly \$20-25 million per year, with the average award for the 2024 fiscal year measuring \$465,976.

The stated **goal** of NWD, per the Sam.gov website, is to “increase the diversity of the nursing workforce by supporting students from disadvantaged backgrounds in becoming registered nurses to decrease health disparities and increase health equity.”

To be clear, the weight of the evidence indicates that diversity has no bearing on health outcomes. In fact, a 2023 Do No Harm **analysis** found that four of five existing systematic reviews of racial concordance in medicine – in which patients are treated by healthcare professionals of the same race – showed no improvement in health outcomes; another systematic **review** earlier in 2025 found similar results.

According to the NWD program’s **grant listing** on the Health Resources and Services Administration (HRSA) website, the purpose of the NWD program “is to increase nursing education opportunities for individuals who are from disadvantaged backgrounds (including racial and ethnic minorities underrepresented among registered nurses).”

NWD’s **Notice of Funding Opportunity** (NOFO) is even more explicit when describing the discriminatory nature of the program and gesturing toward racial concordance.

The NOFO cited an American Nurses Association (ANA) **report** and stated that the report showed that a “lack of diversity in healthcare significantly increases health disparities and contributes to poorer health outcomes and high mortality at disproportionate rates among socially and economically marginalized groups.” The cited report did not support this claim with a citation of its own. It’s also worth noting that the ANA has engaged in a series of efforts to promote DEI and increase diversity within its own ranks as part of its “**racial reckoning**” initiative.

Additionally, per the NOFO, nursing programs that are funded through NWD are required to “implement a

comprehensive systems approach that supports the recruitment, enrollment, retention, and graduation of students from disadvantaged backgrounds, including racial and ethnic minorities underrepresented among registered nurses.”

The NOFO even cites an HRSA **glossary** which defines an underrepresented minority as a person from the following racial or ethnic groups: American Indian or Alaska Native; Black or African American; Native Hawaiian or Other Pacific Islander; and/or Hispanic (all races).

Nursing programs must also “establish and maintain partnerships to include technical assistance from professional nursing organizations to increase enrollment and retention of nursing students from disadvantaged backgrounds, including ethnic and racial minorities underrepresented among registered nurses, including through the provision of support services.”

Here’s the rub: To achieve these diversity goals, the NOFO recommends nursing programs use “evidence-based strategies such as holistic admissions as a best practice.”

Holistic admissions refers to the practice of deemphasizing objective metrics used to determine an applicant’s merit, such as GPA and MCAT scores, and placing greater focus on other academic qualifications, personality traits, or professional accolades.

As one might imagine, in practice this often ends up being a roundabout way of still employing race-conscious admissions despite the Supreme Court’s ruling that such strategies are unconstitutional.

Indeed, as Do No Harm has **documented**, many of the medical schools that employ holistic admissions and have pledged to diversify their student body still engage in racially conscious admissions.

To ensure that recipient nursing education programs are aligned with this diversity cause, NWD reviews recipients based on how well they articulate their plans to engage in this behavior.

- The first criterion assesses a number of factors related to applicants’ diversity efforts: applications must provide “a plan for implementing an actionable framework that targets learning disparities and expands opportunities to support students from disadvantaged backgrounds.”
- Applicants must also “explain how [they] will address the recruitment, enrollment, and retention challenges, among students from disadvantaged backgrounds” and “explain how training will address the health disparities of the surrounding communities.”
- The third criterion requires applicants to “include the number of students from underrepresented and disadvantaged backgrounds recruited, retained, and graduated” when assessing the effectiveness of their diversity efforts, as well as “faculty demographic data.”

Why “faculty demographic data” would be relevant, one can only wonder.

Given this information, it should come as no surprise that the recipients of NWD funds are frequent offenders of racial discrimination. Offending conduct ranges from explicit avowals to prioritize certain racial groups to implicit nods to race-conscious “holistic” admissions strategies aimed at increasing “diversity.”

THE RECIPIENTS

Do No Harm reviewed dozens of grant awards and project descriptions for the highest-dollar awards to draw conclusions about the discriminatory activities of the recipient programs.

Since the 2019 fiscal year, NWD has **awarded** over \$110 million in grant funding.

Recipients of these grants range from state flagship programs, such as the nursing program at the **University of Arizona**, to smaller programs at liberal arts colleges and lesser-known universities.

Multiple recipients promote racially discriminatory scholarship programs or admissions and recruiting strategies that seem on their face to be privileging certain racial groups.

At the very least, the recipient programs who actively advertise their participation in the NWD program maintain some form of organizational commitment to DEI, and often stress recruiting, retention, and admissions strategies that pursue “diversity.”

The recipients listed below are nursing programs who have received funding through NWD in either 2024 or 2025.

FRONTIER NURSING UNIVERSITY

Frontier Nursing University (FNU), a recipient of a \$555,000 grant through NWD in 2024, touts its focus on diversity as well as its commitment to “holistic admissions” as a means of enrolling more “students of color.”

“For nearly two decades, FNU has emphasized the importance of increasing diversity enrollment and retention through a number of initiatives,” the school’s “diversity” **webpage states**. “FNU’s many DEI initiatives include the implementation of a holistic admissions process, the expansion of its Office of DEI staff, diversity training for all members of the FNU community, mentoring programs, the formation of six Student Interest Groups, and the establishment of DEI Faculty Fellow and DEI Staff Ambassador programs. FNU’s enrollment of students of color, just 9% in 2010, has grown to 30% today.”

“In support of our mission of providing accessible nurse-midwifery and nurse practitioner education that integrates the principles of diversity, equity, and inclusion, Frontier Nursing University follows a holistic approach to our admissions process,” the school’s **admissions webpage states**. “Through the holistic admission process, FNU seeks diverse applicants, looking at the applicant as a whole and taking in many factors in considering granting admission to the candidate.”

FNU even boasts about its DEI work and the recognition it has received.

These include statements such as: “FNU is a national leader in DEI and a six-time winner of the INSIGHT Into Diversity Higher Education Excellence in Diversity (HEED) Award, recognized 2018-2024”; “FNU received the 2023 award for Inclusive Excellence, Belonging, and Sustainability in Nursing Education, presented by the American Association of Colleges of Nursing (AACN)”; and “FNU intends to increase

the number and diversity of the nurse-midwifery workforce with a focus on increasing the Hispanic population of nurse-midwives.”

The last statement about increasing the Hispanic population of nurse-midwives appears particularly suspicious, made even more so by FNU’s overtly discriminatory scholarship awards.

The school’s **Lin Bolle Scholarship**, for instance, will “be awarded to a student pursuing a degree in Family Practice or Nurse-Midwifery, whose race or ethnicity has been historically underrepresented, who has overcome hardship, and who wants to use their education to help those living in a medically underserved area.” Another scholarship, the Noel Smith Fernandez scholarship, “is designated for underserved students of color,” while the Dr. Torica Fuller Excellence in Diversity Scholarship is “[a]warded to support students of color pursuing a Women’s Health Nurse Practitioner (WHNP) or Family Nurse Practitioner (FNP) degree.”

UNIVERSITY OF MEMPHIS

The University of Memphis’s nursing program engages in similarly discriminatory behavior, using its NWD funds to operate **diversity scholarships targeted** toward racial minorities.

“The Loewenberg College of Nursing(LCON)is able to offer scholarships for nursing students interested in rural eldercare with funds provided through the Health Resources and Services Administration’s (HRSA) Nursing Workforce Diversity – Eldercare Enhancement (NWD-E2) Program,” the scholarship listing states. “LCON’s Rural Nurses Leading Eldercare Advancement through Diversity (RNs LEAD) project is designed to prepare competent undergraduate nursing students from diverse backgrounds to address health disparities related to access and care delivery for elderly populations in rural and underserved areas of West Tennessee.”

However, the eligibility criteria gives away the game.

“Priority will be given to eligible applicants that (a) meet guidelines for disadvantaged students; (b) identify as an underrepresented racial/ethnic minority; (c) maintain a permanent residence in the geographic target area including Benton, Carroll, Chester, Decatur, Dyer, Gibson, Hardeman, Hardin, Haywood, Henderson, Henry, Lake, Lauderdale, Madison, McNairy, Obion, Tipton and Weakley counties; and (d) express a strong interest in geriatric nursing.”

In other words, one who is not a member of an underrepresented group will not be prioritized. The University of Memphis does not define “underrepresented,” but the AACN, which provides administrative assistance to nursing programs funded by NWD, **defines** “underrepresented” as “men and individuals from African American, Hispanic, Asian, American Indian, and Alaskan native backgrounds.”

What’s more, the scholarship is up to \$8,000 *per semester*, a hefty award that would no doubt remove barriers for numerous students unfortunate enough to not be a member of the university’s favored racial group.



UNIVERSITY OF CINCINNATI

The University of Cincinnati, which received just under \$500,000 in 2024 through NWD, is an interesting case.

The school's nursing program appears to have scrubbed its central web page advertising its DEI activities within the last year or so. Nevertheless, an **archive** of the web page from May 2024 shows what the page previously contained.

The school previously listed its DEI initiatives as including: "Recruiting, retaining and graduating students who reflect the broader U.S. population; Providing dedicated support and opportunities to historically marginalized students; Implementing efforts to increase the diversity and retention of faculty, staff and students; Promoting cultural humility throughout the curriculum; Increasing scholarship opportunities related to diversity, cultural sensitivity and health equity."

And in the "**targeted initiatives**" section of the archived webpage, the University of Cincinnati lists specific DEI programs and policies it pursued to advance diversity among the student body.

These included a Black Student Nurses Day, promotion of DEI training undertaken by faculty, and the university's commitment "to suspend the requirement of standardized test scores as a component of prospective student applications for a two-year pilot period, starting in Fall 2025."

Most offensive, however, is the program's **CURE fellowship**, which is still active on the program's webpage.

Per the fellowship's eligibility criteria, CURE is explicitly discriminatory. Students "must" identify as either "American Indian or Alaska native," "Black or African American," "Native Hawaiian or other Pacific Islander," or "Hispanic."

Additionally, according to an **article** describing the program, its goals are to implement what essentially amounts to a racial quota system.

"The CURE program was designed to center on four objectives that build on successful evidence-based strategies already in place at the college: Increase the sophomore application rate of disadvantaged/URM students to the BSN program to 20%; Provide comprehensive financial, academic, and social support for 35 disadvantaged/URM students; Embed curricula and experiential learning addressing targeted health disparities in Hamilton County, using maternal mortality as an exemplar; and Hire at least four new faculty from URM backgrounds."

MARQUETTE UNIVERSITY

Marquette University in Wisconsin uses its NWD funds to promote **DEI initiatives including** “Project BEYOND-2,” a program designed to increase diversity through grants and administrative support.

“Project BEYOND-2 aims to improve nursing workforce diversity by increasing the numbers of students and graduates from economically and educationally disadvantaged backgrounds, including underrepresented minorities, who will graduate with undergraduate nursing degrees,” a 2021 announcement of grant funding reads.

According to a **description** of the **program**, its grants target racial minorities and individuals from “underrepresented” backgrounds.

These grants include the “Scholarships for Disadvantaged Students (SDS)” which aims to “assist Marquette nursing students from underrepresented and disadvantaged backgrounds who show great promise in the nursing profession.”

Other grants include “Building Nursing Diversity to Promote Equitable Communities” and “Nursing Workforce Diversity-Eldercare 2 (NWD-E2),” the latter of which:

“provides enhanced eldercare education and training opportunities, scholarships, and stipends to undergraduate nursing students from disadvantaged backgrounds, including racial and ethnic minorities underrepresented among registered nurses.”

WESTERN CAROLINA UNIVERSITY

Like the University of Cincinnati, Western Carolina University in North Carolina also appears to have scrubbed information related to its diversity programs; nevertheless, the university received over \$550,000 in 2024 through NWD.

An archived **webpage** from December 5, 2024, details Western Carolina University’s “Pathways to Equity in Nursing” program. The page states that the university will employ “holistic review” admissions practices to increase diversity among the nursing student body and faculty.

“Another goal of the Pathways to Equity in Nursing program will be to incorporate holistic review practices for admission to WCU undergraduate nursing programs using faculty self-governance processes and with external coaching support from the American Association of College of Nursing,” the page reads.

“Faculty will engage in training and development to examine evidence based holistic admissions processes and how these practices can advance the SON’s goals of enhancing diversity and creating an inclusive learning environment.”

“The overarching goal for this project is to increase the number of students who are from disadvantaged backgrounds that are admitted to and graduate from WCU undergraduate BSN programs,” the description continues. “The program also seeks to increase the diversity of the SON faculty for us to create a culture of inclusion in the SON to better serve and support diverse students.”

ADDITIONAL RECIPIENTS

Other recipient institutions include:

- **Saint Louis University:** “Saint Louis University (SLU)’s Trudy Busch Valentine School of Nursing is the recipient of a Health Resources and Services Administration (HRSA) **nursing workforce diversity** grant. SLU’s School of Nursing will receive \$2.1 million in federal funds over the next four years to support underrepresented minorities and disadvantaged students. This is the third time the school has received the nursing workforce diversity grant.”
- **Grand Valley State:** “At GVSU, the Nursing Workforce Diversity (NWD) program is offered through KCON, and aims to increase nursing education opportunities for marginalized students. The program is funded by the HRSA Nursing Workforce Diversity Grant. According to Lewandowski, the University was able to provide support and scholarships to 29 undergraduate students and 20 graduate students in the last three years.”
- **Ursuline College:** “Ursuline College has been approved for a \$2.2 million federal grant to help improve diversity in the nursing workforce.” “Funding from the Health Resources and Services Administration (HRSA) of the U.S. Department of Health and Human Services will help the College improve wrap-around support services for undergraduate nursing students from disadvantaged backgrounds, with a focus on Black students and other underrepresented minorities.”
- **Augusta University:** “Our Nursing Workforce Diversity Grant from the Health Resources and Service Administration allows us to offer a variety of services to our students: Learning communities for selected students; Financial stipend; Faculty advisor; Student-to-student mentoring; Tutoring services; Financial support to attend a nursing conference; One year membership in a nursing journal.”

DEEP CONNECTIONS

The American Association of Colleges of Nursing (AACN), the chief standards-setting body for nursing education programs, is deeply involved in the activities of NWD recipients, providing assistance to nursing programs funded through the program.

“Since 2016, AACN has provided technical assistance program to nursing schools receiving funding through the Nursing Workforce Diversity (NWD) program offered by the Health Resources and Services Administration,” an AACN **fact sheet** says. “This federal funding is awarded to schools looking to provide staff training related to Holistic Admissions Review. AACN’s assistance includes an assessment of admissions practices, an on-site Holistic Admissions Review workshop, student recruitment and retention strategies, and models for building a successful mentoring program.”

The fact sheet then **links** to an AACN site dedicated to holistic admissions.

“Many colleges and universities have employed a holistic admission process to assemble a diverse class of students with the background, qualities, and skills needed for success in the profession,” the site says.

The site contains a **white paper** on holistic admissions that provides further details about the AACN's involvement with the NWD program, and how the "holistic admissions" strategy is a means to increase diversity. From the context of the white paper, it's clear that "diversity" refers largely to an increased number of racial minorities being represented among target populations.

"Beginning in fall 2017, AACN engaged in providing technical assistance for 32 of the 34 (94%) nursing schools who received 4-year HRSA grants to increase nursing workforce diversity using holistic admissions as one of the strategies," the paper reads. "AACN provided workshops for additional schools implementing a holistic admissions review strategy to increase diversity in their enrollment."

The AACN's assistance appears to be continuing to this day.

In fact, the AACN just issued a **press release** in January 2025 explaining how the AACN will help nursing programs aiming to land NWD grants through the AACN's Technical Assistance Program.

According to the press release, the AACN will provide:

- A letter of support for your NWD application
- Expert consultation on grant objectives and desired outcomes
- Administration of the Leading Across Multidimensional Perspectives (LAMPSPM) Culture and Climate Survey
- On-site focus groups to assess learning environment and perceived sense of belonging
- Participation in AACN's signature programming focused on leadership development, innovation sharing, and peer engagement
- Regional meetings and facilitated online discussions
- And more...

The AACN's deep involvement in this process may be explained by the NWD Notice of Funding Opportunity (NOFO), which required institutions receiving NWD funding to "establish and maintain partnerships to include technical assistance from professional nursing organizations to increase enrollment and retention of nursing students from disadvantaged backgrounds, including ethnic and racial minorities underrepresented among registered nurses, including through the provision of support services."

CONCLUSION

Given all of this information, reasonable minds should agree that the NWD program must end immediately. Yet according to the HRSA **website**, the NWD program will distribute awards in July of this year.

The NWD program is a clear example of the federal government using its vast funding capabilities to encourage and incentivize racial discrimination. The nursing workforce is best served when nursing education programs select the best and the brightest, when excellence and merit are prioritized rather than race.

The HHS must either immediately end this program or alter it substantially to remove its discriminatory intent. There is simply no excuse for racial discrimination.





Do No Harm