

October 15, 2021

The Honorable Laura Howard
Secretary Kansas Department for Aging and Disability Services
503 S. Kansas Ave
Topeka, KS 66603

Dear Secretary Howard:

We are a coalition of senior care providers who, along with WSU Tech, the Wichita Regional Chamber of Commerce, and the state long-term care associations, are seeking solutions for our severe workforce shortages in long-term care. We are writing today in the hope that the Kansas Department for Aging and Disability Services will consider our proposal to help increase the number and quality of health care workers in our state.

Adult care homes are in desperate need of an abundant, stable, and well-trained workforce. Certified Nurse Aides are the backbone of long-term care services and support. CNA certification is also a prerequisite for Certified Medication Aides, Home Health Aides, Licensed Practical Nursing and some Registered Nursing programs in Kansas. Finding ways to increase the CNA training pipeline is an essential part of solving workforce issues across the entire health care spectrum. We were therefore very concerned to hear that technical schools such as WSU Tech have had to cancel classes due to a lack of qualified CNA course instructors. The lack of CNA course instructors is a longstanding issue, now exacerbated by the COVID-19 pandemic.

Thankfully, there are several options available to KDADS to both stabilize and expand the number of CNA training programs across the state. We strongly urge the Kansas Department for Aging and Disability Services to adopt and implement the following changes to Kansas nurse aide training regulations.

Broaden the definition of course instructor to include Licensed Practical Nurses (LPNs). K.A.R. 26-50-22(c) requires all Kansas CNA instructors to be Registered Nurses with at least two years of full-time experience. The RN instructor requirement in Kansas does not mirror federal nurse aide training requirements found at C.F.R. 483.152. Federal regulations allow instructors to work under the general supervision of a Registered Nurse which allows for a greater pool of course instructors, including LPNs. We request that KDADS make the necessary changes to Kansas rules and regulations to match federal requirements for CNA program instructors.

Increase student-to-faculty ratio limits for the skills lab portion of CNA training courses. This would allow for additional students to receive CNA instruction without sacrificing quality.

Allow use of simulation laboratories for up to 50% of clinical hours. We appreciate the waivers KDADS has put in place to expand the use of simulated laboratories during the COVID-19 pandemic. A recent study of prelicensure nursing programs by NCSBN (National Council State Boards of Nursing) showed that up to 50% of simulation in those programs produced graduates with comparable entry level skills to those who had no simulation. This evidence combined with our experience using this waiver has shown that simulated laboratories have been very successful in training our CNAs. We ask that this waiver become permanent practice.

There are additional topics that need attention. We would like to clarify whether one year of long-term care experience is necessary to be a CNA instructor. We acknowledge that federal regulations (42 CFR § 483.154) require that the skills demonstration part of the competency evaluation must be "Administered and evaluated by a registered nurse with at least one year's experience in providing care for the elderly or the chronically ill of any age." However, state regulations (K.A.R. 26-50-22) do not require CNA instructors to have one year of long-term care experience. We are seeing conflicting information between these regulations and the instructor application requirements. Course supervisors (which are required to have "at least 1,750 hours of licensed nursing experience in an adult care home or a

long-term care unit of a hospital”) could provide general administration of the competency evaluation without placing undue burdens on training programs or on individual CNA instructors.

This coalition questions if one year of long-term care experience is necessary for creating quality instructors. Quality measures to assure that all objectives are met in the training of CNAs is met through the Course Supervisor, the instructing team, and the rigorous curriculum and instruction.

In facing the recent challenges of the pandemic and realization of a massive caregiver staff shortage, this coalition also has concerns with the delay in implementing changes in the CNA curriculum. Time is of the essence in these matters.

We appreciate your consideration of our proposals concerning CNA training requirements and the need to increase the number of nurse aide training programs available in our State. As a coalition of healthcare professionals, agencies, educational institutions, and long-term care facilities, we would request a meeting with Secretary Howard and KDADS leadership to discuss these important issues and the next steps. If you have any questions, please do not hesitate to contact Robert Miller. He, as well as, Andrew Weins, have been leading these efforts.

Robert Miller, 316-685-3322 or robertm@comfortcarehomes.com.

Thank you again for all that you do, every day, for Kansas seniors and their families.

Respectfully,

Coalition Sign Off:

WSU technology College

- Dr. Sheree Utash, President
- Lynn Loveland, Dean, Health Sciences
- Pat Plank, Associate Dean, Nursing Program
- Gina Hardin-Moyer, Faculty
- Sarah Leftwich, Vice President of Health Science
- Ellen Herdler, Academic Coordinator

Wichita Chamber of Commerce

- Andrew Weins, Vice President Government Relations

KHCA/KCAL

- Polly Berkeley, Vice President of Operations and Education

LeadingAge Kansas

- Rachel Monger, Vice President of Government Affairs

ComfortCare Homes, Inc.

- Robert Miller, Senior Vice President

Midland Care Connection, Inc.

- Shawn Sullivan, President and CEO

Brewster Living

- Joe Ewert, President and CEO

Midwest Health Management

- Joe Perkins, Vice President of Assisted Living

Catholic Care Center

- Luke Sponsel, Administrator AL/MC