

**LeadingAge Maryland - 2023 - SB 370 - CNA GNA(2).p**

Uploaded by: Aaron Greenfield

Position: FAV



576 Johnsville Road  
Sykesville, MD 21784

**TO:** Finance  
**FROM:** LeadingAge Maryland  
**SUBJECT:** Senate Bill 370, Certified Nursing Assistants – Licensing Requirements and Administrative Updates  
**DATE:** February 14, 2023  
**POSITION:** **Favorable**

LeadingAge Maryland supports Senate Bill 370, Certified Nursing Assistants – Licensing Requirements and Administrative Updates.

LeadingAge Maryland is a community of more than 140 not-for-profit aging services organizations serving residents and clients through continuing care retirement communities, affordable senior housing, assisted living, nursing homes and home and community-based services. Members of LeadingAge Maryland provide health care, housing, and services to more than 20,000 older persons each year. Our mission is to be the trusted voice for aging in Maryland, and our vision is that Maryland is a state where older adults have access to the services they need, when they need them, in the place they call home. We partner with consumers, caregivers, researchers, public agencies, faith communities and others who care about aging in Maryland.

This legislation repeals the classification of a “geriatric nurse assistant” in favor of “certified nurse assistant.” Under the bill, a certified nursing assistant must successfully complete an approved nursing assistant training program and meet federal and state laws. The State Board of Nursing is required to provide notifications to geriatric nursing assistants and nursing homes regarding the changes resulting from passage of this bill, including updating the title of geriatric nursing assistants on the renewal of a license. We support the intent and goal of this bill and would also urge the Committee to identify a list of stakeholders who would be best poised to fully evaluate and address this issue.

In light of staffing shortages across the State, exacerbated by the COVID-19 pandemic, nursing homes and struggle to secure sufficient staff. A Certified Nursing Assistant (CNA) is a professional who performs crucial nursing tasks delegated by a registered nurse or a licensed

practical nurse. To become a CNA in most states, individuals must complete a state-approved training program, complete a national and federally required examination, and complete a state-mandated certification exam. A Certified Nursing Assistant is then allowed to work in most healthcare settings including hospitals, long-term care facilities, and nursing homes. The state of Maryland, however, has a unique credentialing system.

Maryland offers several levels and types of nursing assistant certification. Certified Nursing Assistant is regarded as an entry-level credential for those who have completed training programs and cleared background checks. The Geriatric Nursing Assistant (GNA) credential is regarded as the equivalent of the CNA credential issued in most other states. In Maryland, CNAs are only allowed to work in licensed nursing homes for 120 days before they obtain the required GNA certification. If enacted, Senate Bill 370 would alter Maryland's credentialing system to resemble most other states by replacing the classification of "geriatric" with "certified" nursing assistant.

LeadingAge Maryland is invested in ensuring that professionals who are qualified to deliver care in places that most need it, like nursing homes, are allowed a facilitated opportunity to do so. The intent of this bill is to seek to remove the barrier of Maryland's current two-pronged nursing assistant credentialing system. It is also important that there is not undue burden placed on current CNAs and GNAs in terms of any additional examination or training requirements that might be implemented. LeadingAge Maryland recommends that as part of this process, the Maryland Board of Nursing and other stakeholders be convened to fully evaluate the current CNA and GNA certification processes to identify what changes would be necessary to reach this goal. The changes suggested by this bill would no longer require a "geriatric" classification for certified nursing assistants to work in comprehensive care facilities, because CNAs in Maryland would then meet the federal requirements to do so. These changes may also help out-of-state CNAs be qualified to work in Maryland nursing homes without the requirement of additional certification. Introducing such changes is likely to be a step forward in addressing the care-team staffing shortages that long-term care facilities and nursing homes are suffering from.

For these reasons, LeadingAge Maryland respectfully requests a favorable report for Senate Bill 370.

For additional information, please contact Aaron J. Greenfield, 410.446.1992

# **SB0370\_FAV\_LifeSpan, MNCHA, HPCNM\_CNAs - Licensing**

Uploaded by: Danna Kauffman

Position: FAV



Hospice & Palliative Care Network  
OF MARYLAND

TO: The Honorable Melony Griffith, Chair  
Members, Senate Finance Committee  
The Honorable Pamela Beidle

FROM: Danna L. Kauffman  
Pamela Metz Kasemeyer  
Christine K. Krone  
410-244-7000

DATE: February 14, 2023

RE: **SUPPORT** – Senate Bill 370 – *Certified Nursing Assistants – Licensing Requirements and Administrative Updates*

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On behalf of the LifeSpan Network, the Maryland-National Capital Homecare Association, and the Hospice & Palliative Care Network of Maryland, we respectfully **support** Senate Bill 370. The purpose of Senate Bill 370 is to eliminate barriers and provide nursing homes with greater flexibility in hiring individuals.

As you have repeatedly heard, Maryland is experiencing a healthcare worker shortage. The nursing home industry has been hit particularly hard and has been cited in the Maryland Hospital Association 2022 State of Maryland's Health Care Workforce Report as having the highest future demand for registered nurses and licensed practical nurses. This also holds true for the need for additional nursing assistants, who are the backbone of the nursing home workforce. However, because of restrictions in Maryland, nursing homes cannot hire certified nursing assistants (CNAs). Rather, nursing homes in Maryland can only hire geriatric nursing assistants, which creates an additional hurdle in hiring.

It is unclear why Maryland is an outlier in this standard. Nationally, CNAs can work in all settings, including nursing homes. Maryland requires that a CNA obtain an additional designation on his/her certification. It does not require additional training requirements. Therefore, by eliminating extra steps, CNAs will have the option to work in all settings, easing hiring. This will also help nursing homes that border contiguous states not lose workers because of this restriction.

Removing unnecessary barriers in hiring benefits the continuum as a whole. Nursing homes have had to limit admissions because of not having enough staff, which hurts the hospitals and other care settings. Senate Bill 370 will align Maryland with other states and help nursing homes hire to ensure that they can meet staffing requirements and provide quality care to residents. We urge a favorable vote.

# **SB 370- - Certified Nursing Assistants – Licensing**

Uploaded by: Jane Krienke

Position: FAV



Maryland  
Hospital Association

## **Senate Bill 370 - Certified Nursing Assistants – Licensing Requirements and Administrative Updates**

**Position: Support**  
February 14, 2023  
Senate Finance Committee

### **MHA Position**

On behalf of the Maryland Hospital Association's (MHA) 60 member hospitals and health systems, we appreciate the opportunity to comment on Senate Bill 370.

Maryland hospitals are facing the most critical staffing shortage in recent memory. A 2022 [GlobalData](#) report estimates a statewide shortage of 5,000 full-time registered nurses and 4,000 licensed practical nurses. Without intervention, shortages could double or even triple by 2035. MHA's [2022 State of Maryland's Health Care Workforce report](#) outlines a roadmap to ensure Maryland has the health care workforce it needs now and into the future.

Hospital data show nearly one in five—or 18.9%—of nursing assistant positions are currently vacant.<sup>1</sup> Over the past year, Maryland hospitals worked together to address the high demand for certified nursing assistants (CNAs) by creating an acute care CNA pathway. MHA is working with the Maryland Board of Nursing and Credentia to create a standardized exam. The CNA workforce can grow the nursing pipeline if proper supports are in place for career advancement and administrative barriers are removed.

SB 370 would remove the distinction between certified nursing assistants and geriatric nursing assistants. Currently the state requires an individual to have the geriatric nursing assistant (GNA) certification in addition to a CNA certification to work in a nursing home or other long-term care setting. These GNAs must comply with federal requirements for nurse aides working in nursing homes, including passing the National Nurse Aide Assessment Program (NNAP) exam.

**Based on our review of SB 370, the bill would not require a graduate of an acute care CNA training program to take the NNAP. However, if this is not the case, MHA would not support this legislation as doing so would place an unnecessary burden and potential cost on those who want to work in settings other than a nursing home or other long-term care facility.**

Maryland's NNAP examination requires a written test (or oral if needed) and skills test, which can cost up to \$105.<sup>2</sup> Maryland's initial examination and CNA certification fee is \$20.<sup>3</sup> The

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<sup>1</sup> MHA Workforce Survey – January 2023

<sup>2</sup> Credentia. (October, 2021). "[Maryland Nurse Aide Handbook](#)."

<sup>3</sup> Maryland Board of Nursing. (November 28, 2019). "[Schedule of Fees](#)."

federal requirements for training and examination were initially established to create a minimum standard for the nursing home nurse aide workforce.<sup>4</sup> Maryland's traditional CNA training programs already emphasize skills more useful for the post-acute setting. Hospitals often must retrain CNAs to thrive in the acute care environment.

The broad definition of a certified nursing assistant in Maryland statute is "an individual **regardless of title** who routinely performs nursing tasks delegated by a registered nurse or licensed practical nurse for compensation; and does not include a certified medication technician."<sup>5</sup> As such, hospitals rely on CNAs to support nursing staff.

We appreciate the sponsor's attention to strengthening the health care workforce and look forward to achieving sustainable solutions to support Maryland's future health care workforce in collaboration with the Maryland Board of Nursing and stakeholders across the care continuum.

For these reasons, we ask for a *favorable* report on SB 370 as long as graduates of acute care CNA training programs are not required to take the national exam.

For more information, please contact:

Jane Krienke, Senior Legislative Analyst, Government Affairs  
Jkrienke@mhaonline.org

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<sup>4</sup> Office of Inspector General. (August, 2002). "[State Nurse Aide Training: Program Information And Data.](#)"

<sup>5</sup> §Health Occupations 8-6A-01



# **HFAM Testimony SB 370.pdf**

Uploaded by: Joseph DeMattos

Position: FAV



**TESTIMONY BEFORE THE  
SENATE FINANCE COMMITTEE**

February 14, 2023

Senate Bill 370: Certified Nursing Assistants – Licensing Requirements and Administrative Updates  
*Written Only Testimony*

**POSITION: FAVORABLE**

On behalf of the members of the Health Facilities Association of Maryland (HFAM), we appreciate the opportunity to express our support for Senate Bill 370. HFAM represents skilled nursing centers and assisted living communities in Maryland, as well as associate businesses that offer products and services to healthcare providers. Our members provide services and employ individuals in nearly every jurisdiction of the state.

Senate Bill 370 repeals references to “geriatric nursing assistant” (GNA) and replaces them with certified nursing assistant (CNA). The bill alters the definition of “CNA” to specify that a CNA has successfully completed an “approved nursing assistant training program. The definition of “approved nursing assistant training program” is altered to mean a course of training that meets the basic nursing assistant curriculum required under federal and State law.

The Maryland State Board of Nursing (MBON) is required to notify GNAs regarding the changes resulting from this legislation’s passage, update GNA to CNA on licensure renewals, update regulations in consultation with the Office of Health Care Quality, and notify nursing homes that they are permitted to employ MBON-certified CNAs who successfully complete an approved nursing assistant training program without the designation of GNA to perform delegated tasks.

In Maryland and throughout the country, we are facing a shortage of healthcare workers across settings, with particularly fewer people working in skilled nursing and rehabilitation centers. Workforce recruitment and retention was a challenge before the pandemic and it has only grown more challenging. Licensed healthcare professionals are scarce and all healthcare settings are competing for employees from the same labor pool.

To become a CNA in most states, an individual must complete a state-approved training program, take a federal exam, and complete a state certification exam. Once a licensed, the CNA may work in most healthcare settings including both hospitals and nursing homes. However, in order to work in a Maryland nursing home, an individual must complete an additional certification step to become a licensed GNA.

This legislation will eliminate the extra step for nursing assistants to work in a Maryland nursing home. CNAs will be able to work in all healthcare settings and this legislation will broaden the pool of qualified applicants for positions in nursing homes. Additionally, it will allow out of state CNAs to be qualified to work in a Maryland nursing home without additional certification.

These changes will be help address the staffing shortages faced by Maryland nursing homes. Nursing assistants are truly the backbone of the nursing home workforce – they keep things running smoothly and provide quality care to residents and patients. Removing barriers to entry for nursing assistants in long-term care settings is a critical and important step we can take now that will help with the ongoing workforce shortage.

**For these reasons, we request a favorable report from the Committee on Senate Bill 370.**

*Submitted by:*

Joseph DeMattos, Jr.  
President and CEO  
(410) 290-5132

**SB370 CNA.pdf**

Uploaded by: Pamela Beidle

Position: FAV

PAMELA G. BEIDLE  
Legislative District 32  
Anne Arundel County

DEPUTY MAJORITY WHIP

Finance Committee

Chair, Executive Nominations Committee

Spending Affordability Committee

Joint Committee on Gaming Oversight

Joint Committee on Management of  
Public Funds

Chair, Anne Arundel County  
Senate Delegation



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11 Bladen Street, Room 202  
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THE SENATE OF MARYLAND  
ANNAPOLIS, MARYLAND 21401

**SB 370**

**Certified Nursing Assistants – Licensing Requirements & Administrative Updates**

Good Afternoon Chair Griffith, Vice Chair Klausmeier and Members of Finance;

Thank you for the opportunity to present Senate Bill 370, Certified Nursing Assistants – Licensing Requirements & Administrative Updates. This bill seeks to address a critical issue that has been a theme for this legislative session – the healthcare worker shortage.

As a member of the Oversight Committee on Quality Care in Nursing Homes and Assisted Living as well as the Commission to Study the Health Care Workforce Crisis in Maryland, we have repeatedly heard the difficulties nursing homes experience hiring staff, ultimately, forcing them to rely on more expensive nurse staffing agencies.

This issue simply doesn't affect the nursing homes; it affects all other settings. For example, hospitals have reported that patients are staying in the hospitals longer because nursing homes cannot staff all their beds. This affects our ability to be successful in controlling costs under our All Payor Waiver.

In order to ensure that nursing homes can be appropriately and adequately staffed, we must eliminate any barriers. One such barrier is the ability or inability for nursing homes to employ certified nursing assistants (known as CNAs). Nationally, CNAs can work in all settings. However, Maryland is the **only** state that does not allow a CNA to work in a nursing home. Rather, to work in a nursing home, Maryland requires an individual to be a geriatric nursing assistant, which can be viewed as an "add-on" to the certification for a nursing assistant. If all other states allow CNAs to work in nursing homes, shouldn't Maryland?

Senate Bill 370 makes necessary changes to allow CNAs to work in nursing homes, it does not reduce training requirements for those working in nursing homes. Federal regulations require that those who work in nursing homes satisfy certain training requirements. In order to be

approved as a CNA Training Program, a vendor must comply with these federal regulations. The emphasis in this bill is to remove administrative steps that accompany this additional designation.

The hope for this bill is that it will create fluidity for the worker to be able to move between health care settings, increase the workforce that nursing homes can hire and hopefully stop individuals from leaving Maryland to go to work in neighboring states.

I respectfully request a favorable vote on SB 370.

**MSCAN - SB 370 - CNAs - FAV[75].pdf**

Uploaded by: Sarah Miicke

Position: FAV



# Maryland Senior Citizens Action Network

## MSCAN

AARP Maryland

Alzheimer's  
Association,  
Maryland Chapters

Baltimore Jewish  
Council

Catholic Charities

Central Maryland  
Ecumenical Council

Church of the Brethren

Episcopal Diocese of  
Maryland

Housing Opportunities  
Commission of  
Montgomery County

Jewish Community  
Relations Council of  
Greater Washington

Lutheran Office on  
Public Policy in  
Maryland

Maryland Association of  
Area Agencies on Aging

Maryland Catholic  
Conference

Mental Health  
Association of Maryland

Mid-Atlantic LifeSpan

National Association of  
Social Workers,  
Maryland Chapter

Presbytery of Baltimore

The Coordinating  
Center

MSCAN Co-Chairs:  
Carol Lienhard  
Sarah Mücke  
410-542-4850

## SB 370

### Certified Nursing Assistants – Licensing Requirements and Administrative Updates

Senate Finance Committee  
February 14, 2023

## SUPPORT

*The Maryland Senior Citizens Action Network (MSCAN) is a statewide coalition of advocacy groups, service providers, faith-based and mission-driven organizations that supports policies that meet the housing, health and quality of care needs of Maryland's low and moderate-income seniors.*

**MSCAN supports SB 370**, which removes the "Geriatric Nursing Assistant" distinction and replaces it with "Certified Nursing Assistant (CNA)" and specifies that CNAs have successfully completed an approved nursing assistant training program.

**Maryland is an outlier by having a Geriatric credentialing in addition to the Certified Nursing Assistant certification.** In most states, in order to become a CNA, a person completes a state-approved course, a federally required examination, and a state-mandated certification exam. Once someone completes those requirements, they are able to work in a variety of health care settings, including nursing homes and assisted living facilities. Maryland is unique in that it requires an additional examination and certification – Geriatric Nursing Assistant – to work in comprehensive senior care centers. This creates an additional hurdle for nursing homes and assisted living facilities trying to hire staff. SB 370 puts Maryland's nursing assistant credentialing system in line with other states.

**SB 370 will help to alleviate the staffing shortages for nursing assistants across the state.** Particularly in light of the COVID-19 pandemic, nursing homes and other senior care centers have struggled to maintain sufficient staffing to care for older adults. Removing the additional hurdle for nursing assistants to obtain their Geriatric certification will open up the number of nursing assistants in the pool for staffing. Additionally, it would allow out-of-state CNAs to be qualified to work in Maryland nursing homes and assisted living facilities without having to complete additional certifications. Ultimately, allowing CNAs to work in nursing care facilities will increase the number of qualified staff able to assist and care for seniors and older adults in health care settings in Maryland.

**For the reasons stated above, MSCAN urges a favorable report on SB 370.** Thank you for your consideration.



**8 - SB 370 - FIN - MBON - LOSWA.docx.pdf**

Uploaded by: State of Maryland (MD)

Position: FWA



# Board of Nursing

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Acting Secretary

February 14, 2023

The Honorable Melony Griffith  
Chair, Senate Finance Committee  
3 East Miller Senate Office Building  
Annapolis, MD 21401-1991

**RE: SB 370 – Certified Nursing Assistants – Licensing Requirements and Administrative Updates – Letter of Support with Amendments**

Dear Chair Griffith and Committee Members:

The Maryland Board of Nursing (the Board) respectfully submits this letter of support with amendments for Senate Bill (SB) 370 – Certified Nursing Assistants – Licensing Requirements and Administrative Updates. This bill requires a certified nursing assistant to successfully complete an approved nursing assistant training program meeting certain requirements; requires the State Board of Nursing to provide certain notifications to geriatric nursing assistants and nursing homes regarding the provisions of this Act; and requires the Board to update the title of geriatric nursing assistants on the renewal of a license.

The Board believes the intent of this bill is to increase the front line/direct care nursing workforce. By consolidating the role of a certified nursing assistant (CNA) to one designation, individuals will have greater flexibility in moving between different acute and long – term health care settings. This would allow individuals to acquire experience in assisting patients with differing and complex health care needs. The Board additionally believes this bill will assist in the portability of nursing assistants within and outside the state of Maryland.

A certified nursing assistant (CNA) is a staff member of a patient’s healthcare team that performs important patient – centered tasks under the supervision of licensed nursing staff. Responsibility of a certified nursing assistant can include: assisting patients with activities of daily living, serving meals and assisting patients with eating, lifting and moving patients, taking vital signs, facilitating patient care, providing companionship, etc. The national landscape for CNAs allows flexibility to work in the hospital, long – term residential facility, nursing home, rehabilitation center, adult daycare center, and clinical facility settings. In the state of Maryland, however, this flexibility is not afforded under Maryland Health Occupations Article Subtitle 6A – Certification of Nursing Assistants, Dialysis Technicians, and Medication Technicians.

The role of a nursing assistant in Maryland is currently classified into two (2) designations: (1) the certified nursing assistant certification and (2) the geriatric nursing assistant (GNA) certification. A certified nursing assistant is defined as an “individual who routinely performs nursing tasks delegated by a registered nurse (RN) or licensed practical nurse (LPN) for

compensation<sup>1</sup>”. An individual applying for a certified nursing assistant certification must: (1) successfully complete a Board approved training program; (2) successfully pass an objective final examination; and (3) demonstrate the ability to competently perform assistive nursing functions<sup>23</sup>. The certification of a CNA, as it is currently written in statute, does not meet federal requirements. As such, CNAs are only authorized to practice in the acute care setting (i.e. hospital, inpatient environment).

A geriatric nursing assistant (GNA), in contrast, is defined as a “certified nursing assistant who has successfully completed the requirements for a GNA set forth in federal regulations 42 CFR §§483.151—483.156 and COMAR 10.07.02.39—.42 (Nursing Home)”. An individual applying for a geriatric nursing assistant certification must: (1) attend a federally approved geriatric nursing assistant training program; (2) pass the nationally recognized skills and certification exam; and (3) register on the Maryland Geriatric Nursing Assistant Registry. This designation, as it is currently written in statute, meets federal requirements. As such, GNAs are authorized to practice in all acute and long – term care settings (i.e. nursing homes, assisted living facilities, etc.).

The Board believes the following amendments are critical in providing a seamless transition for employers and employees who are interested in consolidating the nursing assistant designation.

On page 3. Lines 28 – 29. Add Language:

**(1) MEETS THE [basic nursing assistant curriculum **REQUIRED**] REQUIREMENTS UNDER FEDERAL AND STATE LAW;**

On pages 4 and 5. Line 26; Lines 1 – 4. Remove Language:

(1) Means an individual regardless of title who **ROUTINELY** [routinely]:

**(I) [**ROUTINELY**] performs nursing tasks delegated by a registered nurse or licensed practical nurse for compensation; and**

**[(II) HAS SUCCESSFULLY COMPLETED AN APPROVED NURSING ASSISTANT TRAINING PROGRAM]**

On page 5. After Line 15. Add Language:

**(O) “NURSING ASSISTANT COMPETENCY EVALUATION” MEANS AN EXAMINATION APPROVED BY THE BOARD THAT:**

**(1) DETERMINES THE COMPETENCY OF AN INDIVIDUAL TO PRACTICE AS A NURSING ASSISTANT; AND**

**(2) MEETS THE REQUIREMENTS MANDATED UNDER FEDERAL LAW.**

<sup>1</sup> COMAR 10.39.01.01 – Definitions. <http://www.dsd.state.md.us/comar/comarhtml/10/10.39.01.01.htm>

<sup>2</sup> COMAR 10.39.02.07 – Training Program. <http://www.dsd.state.md.us/comar/comarhtml/10/10.39.02.07.htm>

<sup>3</sup> COMAR 10.39.02.08 – Evaluation. <http://www.dsd.state.md.us/comar/comarhtml/10/10.39.02.08.htm>

On page 5. Lines 25 – 31. Add and Remove Language:

- (1) Content consistent with State licensing requirements in the Health – General Article and all federal requirements; **AND**
- (2) All basic skills required of a nursing assistant regardless of the setting of the practice [; and
- (3) Any skills required for certification in a specific category].
- (d) Any additional clinical practice skills **OR KNOWLEDGE** specific to a setting of practice shall be taught in that setting as part of the employment training process in that setting, **INCLUDING BUT NOT LIMITED TO, THE SETTINGS OF SCHOOL HEALTH AND DEVELOPMENTAL DISABILITIES ADMINISTRATION.**

On page 6. Lines 3 – 6. Remove and Amend Language.

[(f) The provisions of this section may not be interpreted to impose additional requirements for [geriatric] **CERTIFIED** nursing assistants beyond those required under federal law.]

[(g)] **(F)** The Board shall approve the use of a nursing assistant training site by a...

**INSERT NEW SECTION § 8-6A-02. CERTIFICATION TO PRACTICE AS A NURSING ASSISTANT, DIALYSIS TECHNICIAN, OR MEDICATION TECHNICIAN**

**(5) MEETS THE REQUIREMENTS SET FORTH UNDER 42 CFR § 483.35(d)(1)-(4):**

[(5)] **(6)** Performs medication technician tasks as a student...

[(6)] **(7)** Performs dialysis technician tasks as a student...

[(7)] **(8)** Works as a principal or school secretary...

**INSERT NEW SECTION § 8-6A-05. CERTIFICATES; RULES AND REGULATIONS**

(a) The Board shall adopt regulations establishing:

(1) [Categories of certified nursing assistants, including geriatric nursing assistants, home health aides, school health aides, individuals working in developmental disabilities administration facilities, and medicine aides;

(2) Qualifications for [each category of] certified nursing [assistant] **ASSISTANTS, INCLUDING MEDICINE AIDES;**

[(3)] **(2)** Qualifications for certified dialysis technicians;

[(4)] **(3)** Qualifications for certified medication technicians;

[(5)] **(4)** Standards for qualification of applicants for certification, including the applicant's criminal history, work record, and prohibitions against behavior which may be potentially harmful to patients; and

[(6)] **(5)** Standards for the online provision of didactic instruction in a nursing assistant training program that meets the requirements established by the Board.

(2) Requirements set by the Board under paragraph (1) of this subsection regarding qualifications for certification as a [geriatric] **CERTIFIED** nursing assistant shall include provisions to allow...

(vii) Be at least 18 years old to apply for certification as a medication technician.

**(2) IN ADDITION TO THE REQUIEIMENTS UNDER PARAGRAPH (1) OF THIS SUBSECTION, AN APPLICANT FOR CERTIFICATION AS A CERTIFIED NURSING ASSISTANT SHALL SUBMIT TO THE BOARD SATISFACTORY EVIDENCE OF PASSING A NURSING ASSISTANT COMPETENCY EVALUATION.**

[(2)] **(3)** Subject to paragraph (1) of this subsection, an applicant for certification as a certified nursing assistant or dialysis technician...

[(3)] **(4)** An applicant for certification as a certified medicine aide...

[(4)] **(5)** An applicant for a certificate may not:

INSERT NEW SECTION § 8-6A-07. CERTIFICATES; NURSING ASSISTANTS. DIALYSIS TECHNICIANS, MEDICINE AIDES, MEDICATION TECHNICIANS.

(2) Each certificate shall include:

- (i) Any expiration date; **AND**
- (ii) The type of certificate [; and
- (iii) Any specific category of nursing assistant].

INSERT NEW SECTION § 8-6A-08. RENEWAL OF CERTIFICATES

(4) Provides satisfactory evidence of [completion of]:

(i) **COMPLETION OF** 16 hours of active nursing assistant practice within the 2 – year...

(ii) If the nursing assistant did not complete 16 hours of active practice as required under item (i) of this item, [an approved nursing assistant training program or an approved nursing

assistant refresher training program] **ONE OR BOTH OF THE FOLLOWING** as required in regulations adopted by the Board in accordance with subsection [(m)] **(N)** of this section:

**1. SUCCESSFUL COMPLETION OF AN APPROVED NURSING ASSISTANT TRAINING PROGRAM; OR**

**2. PASSING A NURSING ASSISTANT COMPETENCY EVALUATION; AND**

**(5) FOR THE FIRST RENEWAL CYCLE ON OR AFTER JANUARY 1, 2024, UNLESS FORMERLY CERTIFIED AS A GERIATRIC NURSING ASSISTANT, PROVIDES SATISFACTORY EVIDENCE OF:**

**(I) SUCCESSFUL COMPLETION OF AN APPROVED NURSING ASSISTANT TRAINING PROGRAM; AND**

**(II) PASSING A NURSING ASSISTANT COMPETENCY EVALUATION.**

(n)(1) The Board shall adopt regulations to specify [:

(i) The] **THE** circumstances under which a nursing assistant, as a condition of renewal, is required to complete either an approved nursing assistant training program or [an approved nursing assistant refresher training program] **PASS A NURSING ASSISTANT COMPETENCY EXAMINATION, OR BOTH**]; and

(ii) The number of didactic instruction hours and clinical training hours the nursing assistant training program or nursing assistant refresher training program must have to be approved].

For the reasons discussed above, the Maryland Board of Nursing respectfully submits this letter of support with amendments for SB 370.

I hope this information is useful. For more information, please contact Ms. Iman Farid, Health Planning and Development Administrator, at [iman.farid@maryland.gov](mailto:iman.farid@maryland.gov) or Ms. Rhonda Scott, Deputy Director, at (410) 585 – 1953 ([rhonda.scott2@maryland.gov](mailto:rhonda.scott2@maryland.gov)).

Sincerely,



Gary N. Hicks  
Board President

**The opinion of the Board expressed in this document does not necessarily reflect that of the Department of Health or the Administration.**