



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.¹ 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 \$105.² Maryland's initial examination and CNA certification fee is \$20.³ The

¹ MHA Workforce Survey – January 2023

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

³ 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.⁴ 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."⁵ 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:

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

⁵ §Health Occupations 8-6A-01