

LeadingAge Maryland - 2022 - SB 909 - NHA.pdf

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576 Johnsville Road
Sykesville, MD 21784

TO: Finance Committee
FROM: LeadingAge Maryland
SUBJECT: Senate Bill 909, Health Occupations - Nursing Home Administrator -
Qualifications
DATE: March 17, 2022
POSITION: **Favorable**

LeadingAge Maryland supports Senate Bill 909, Health Occupations – Nursing Home Administrator - Qualifications

LeadingAge Maryland is a community of more than 135 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. Our mission is to expand the world of possibilities for aging in Maryland. We partner with consumers, caregivers, researchers, public agencies, faith communities and others who care about aging in Maryland.

This bill establishes an exception to the requirement that an individual be licensed by the State Board of Examiners of Nursing Home Administrators before the individual may practice in this State for a person who holds a license in another state and has certain level experience.

Nursing home administration is a challenging field with a reported annual turnover rate of 40 percent. Studies suggest the causes include red tape, roadblocks, an ever-changing field of regulations, emotional exhaustion, and cynicism, all confronted while trying to provide patients and residents the best possible quality of care. And, more than two years into the COVID-19 pandemic, the nursing home industry is facing a crisis that appears to only get worse as each year progresses. Attracting and retaining qualified nursing home administrators to run efficient nursing homes is critical. Nursing home administrators coordinate all of the administrative and clinical activities that directly contribute to patient or resident quality of care. As a nursing home administrator, responsibilities include everything from monitoring medical practices to overseeing facility operations to ensuring that your facility complies with all local and federal regulations. Given the workforce challenges along with the impact of COVID-19, Maryland needs statutory flexibility to license nursing home administrators.

Currently, a Maryland applicant seeking to obtain an Administrator License is required to undergo a 12-month full-time Administrator in Training (AIT) Program prior to being able to sit for the Maryland exam. There are times that that period of training time can be reduced by the board, but it is seldom reduced by more than 60 to 90 days. For example, a recent college graduate with a degree in healthcare administration would be required to train full-time for an entire year (totaling 2080 hours) before being permitted to take the exam to become a nursing home administrator. The required training in neighboring states is much less for an applicant with a health-related degree.

In an effort to recruit and retain nursing home administrators, LeadingAge Maryland fully supports the provisions of Senate Bill 909 that reduce training requirements and provide credit for work experience, Maryland must do more to address this growing gap in the industry. This bill appropriately permits an individual who holds an active nursing home administrator license, in good standing, in another state to practice in Maryland if the individual has a minimum of 3 years of experience as a nursing home administrator or 6 years of experience as an assistant nursing home administrator. That applicant must have completed 9 months (currently 1 year) of full-time nursing home administration in a nursing home or have completed 6 months of full-time nursing home administration in a nursing home and have completed an internship in a nursing home or assisted living program, and hold an active certification issued by the state board of nursing and have at least 10 years of experience at a nursing home, or have at least 3 years of experience as a director of nursing.

For these reasons, LeadingAge Maryland respectfully requests a favorable report for Senate Bill 909.

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

SB0909_FAV_LifeSpan_NH Administrator - Qualificati

Uploaded by: Danna Kauffman

Position: FAV



*Keeping You Connected...Expanding Your Potential...
In Senior Care and Services*

TO: The Honorable Delores G. Kelley, Chair
Members, Senate Finance Committee
The Honorable Katherine Klausmeier

FROM: Danna L. Kauffman
Pamela Metz Kasemeyer

DATE: March 17, 2022

RE: **SUPPORT** – Senate Bill 909 – *Health Occupations – Nursing Home Administrator – Qualifications*

On behalf of the LifeSpan Network, the largest and most diverse senior care provider association in Maryland representing nursing facilities, assisted living providers, continuing care retirement communities, medical adult day care centers, senior housing communities and other home and community-based services, we **support** Senate Bill 909.

This bill authorizes an individual who holds an active nursing home administrator license in good standing in another state to practice in Maryland if the individual has three years' experience as a nursing home administrator or six years as an assistant nursing home administrator. The bill also states that a new licensure applicant must have completed a full-time administrator in training program for a period of 9 months, or a full time administrator in training program for 6 months if the applicant: holds a bachelor's degree in healthcare administration and completed an internship in a nursing home or assisted living program; or holds an active certification issued by the state board of nursing and has at least 10 years of experience at a nursing home or has at least 3 years of experience as a director of nursing.

Maryland must ensure that we have a robust workforce in senior care. Nursing home administrators are part of this workforce. Maryland's nursing home administrator licensure requirements are among the most stringent in the country. This bill would bring licensure requirements more in line with other states in our region, while still requiring education, training, and experience that prepares nursing home administrators for the complex role of administration in long-term care settings. By reducing the number of months required for an administrator in training program dependent on an applicant's existing experience and education, this bill also seeks to make licensure more attainable for nurses, directors of nursing, and healthcare administration graduates. For these reasons, LifeSpan urges a favorable vote.

For more information call:

Danna L. Kauffman
Pamela Metz Kasemeyer
410-244-7000

HFAM Testimony & Supporting Materials SB 909.pdf

Uploaded by: Joseph DeMattos

Position: FAV



**TESTIMONY BEFORE THE
SENATE FINANCE COMMITTEE**
March 17, 2022
Senate Bill 909: Health Occupations -
Nursing Home Administrator – Qualifications

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 909.

HFAM represents over 170 skilled nursing centers and assisted living communities in Maryland, as well as nearly 80 associate businesses that offer products and services to healthcare providers. Incorporated over 70 years ago, HFAM is the oldest and largest long-term care provider association in the state and is affiliated with the American Health Care Association/National Center for Assisted Living (AHCA/NCAL). The skilled nursing and rehabilitation centers we represent provide the majority of care to Marylanders in need across all payor sources annually including Medicare, Medicaid, and private pay.

Senate Bill 909 was introduced per our request. We very much appreciate Senator Klausmeier bringing forth this important legislation. We will note that all three of Maryland’s post-acute and long-term care associations – HFAM, LeadingAge Maryland, and the LifeSpan Network – support Senate Bill 909.

This legislation authorizes an individual who holds an active nursing home administrator license in good standing in another state to practice in Maryland if the individual has three years of experience as an administrator or six years of experience as an assistant administrator. The State Board of Examiners of Nursing Home Administrators (BENHA) must waive any education requirements for an individual who was licensed, remains in good standing, and practiced as an administrator for at least three years in another state. In addition, this legislation authorizes an individual to satisfy criteria for licensure if they meet certain education and professional requirements.

In other words, Senate Bill 909 expands the nursing home administrator workforce by allowing for more interstate reciprocity of qualified individuals between states. It also removes barriers to entry by giving professional credit to applicants who are licensed and experienced in another role, and to applicants who have a degree in healthcare or aging.

Considering that many in our sector come from diverse backgrounds and communities, it is especially important that we remove barriers to career advancement for qualified individuals with professional on-the-job experience. We are proud of the fact that this legislation would allow for individuals with professional experience to move up the career ladder.

These four points are most important:

1. Senate Bill 909 requires BENHA to recognize interstate reciprocity for practicing healthcare professionals similar to those provisions enacted by the Maryland Department of Health (MDH)

during the COVID-19 State of Emergency for physicians, nurses, nursing assistants, pharmacists, and other licensed professionals. Additionally, this legislation requires BENHA to consider the professional experience of an applicant to become a licensed nursing home administrator (LNHA) and to reduce the Administrator-in-Training (AIT) requirement based on professional experience. AIT requirements would not be reduced to fewer than six months.

2. This legislation does NOT remove the AIT requirement or the requirement to pass the written qualification exam. Nor does it remove any other requirements such as background checks.
3. Currently, BENHA may reduce the AIT requirement to six or nine months instead of 12 months and there is a procedure for reciprocity known as endorsement. However, in practice, the Board seldom reduces the AIT to six months, and because Maryland's LNHA requirements are more demanding compared to other states, it is rare for reciprocity to be granted by the Board.
4. There are existing provisions in the current regulations that allow for a petition to BENHA for emergency, temporary licensure in certain situations.

In a 2021 study, JAMDA found that administrators and other nursing home staff are facing significant burden in the workplace due to COVID-19, which is likely to contribute or lead to “increased burnout, turnover, and staff shortages in long-term care” (January 2021, [Journal of the American Medical Directors Association](#)). Workforce recruitment and retention, including nursing home administration, has long been a challenge in healthcare, and over the last two years, it has become much more challenging due to the pandemic.

Based on our members' experiences, it is incredibly challenging to recruit and retain administrators in the state. In January 2022, HFAM surveyed skilled nursing and rehabilitation centers on the challenges associated with hiring and retaining licensed nursing home administrators in Maryland. The data collected represents approximately one quarter of the Maryland long-term care sector. In this survey, 98% of respondents stated that it is difficult to recruit and retain LNHA's in Maryland.

In this survey, we also asked about the biggest barriers to entry among licensed nursing home administrators in Maryland. Responses included:

- Minimal turnover, but when there is an opening finding talent remains a challenge.
- No reciprocity. Burdensome AIT process.
- Length of AIT program and finding a facility to support the AIT.
- Licensure process when transferring from other states.
- Impossible to find someone licensed from another state to work in MD. Finding an AIT program.
- BENHA makes it overly onerous. Experienced DONs and other department heads complete nine months to one year when regulations allow six months. This should be even shorter for those with experience.
- The regulatory environment in MD compared to other states.
- COVID fatigue, staffing challenges, reporting requirements, challenging regulations, visitation, and testing.
- Nobody wants to do the job anymore.

As some of these responses indicate, nursing home administration is not immune to the workforce shortages we are seeing more broadly across the healthcare continuum. Throughout the pandemic, nursing home administrators have been responsible for implementing continually changing guidance and recommendations from both federal and state agencies.

Regarding the number of active nursing home administrators in Maryland, we do not believe the list kept by the Board of Examiners of Nursing Home Administrators is reflective of the realities of the nursing home administrator workforce in Maryland. The BENHA list of approximately 560 administrators includes individuals who may be licensed in Maryland but live in another state, are retired, those who may have changed careers or roles, and those who simply are not seeking employment in the field.

For example, many nursing homes and nursing home organizations employ multiple LNHAAs. However, not all those licensed as an administrator work in the administrator role. They may work as a director of nursing or in management while maintaining their administrator license. Thus, these individuals are on the BENHA licensee list but are not available to fill a vacancy in another center.

Some will testify that Maryland's demanding licensed nursing home administrator requirements and focus on excess safety is necessary to protect residents and patients. However, the data doesn't support that notion.

HFAM Table #1:

This table compares three states (MI, MN, RI) that have less strict requirements with three states (NJ, MD, NH) that have more strict requirements.

- The data shows that states with lower requirements do not have more problems with healthcare quality and management in skilled nursing and rehabilitation centers.
- For example, states with lower requirements have a lower turnover of RNs and administrators and 44% fewer long-stay residents with depressive symptoms compared with states with more strict requirements.

HFAM Table #2:

Despite the stricter requirements for licensed nursing home administrators, Maryland has not necessarily performed better than the states with fewer requirements.

- For example, Maryland had 57% higher health deficiencies, on average, compared to the three states with fewer requirements (MI, MN, and RI).
- Maryland's nursing home administrator turnover rate is twice that of states with fewer licensure requirements.

HFAM Table #3 and #4:

These tables show quality metrics and LNHA administrator requirements. The states are arranged based on administrator requirements in order from least to most strict. As these tables show, the states with less strict LNHA requirements do not necessarily have a lower quality of care.

As we have advocated for years based on the data:

- We don't believe there is a causal relationship between Maryland's year-long, 2080-hour AIT program as an exclusive driver of quality care in Maryland's skilled nursing and rehabilitation centers.
- States with fewer licensed nursing home requirements do not have more quality issues.
- Even with stricter requirements, Maryland does not necessarily do better on key quality categories, but still does better on some. For instance, Maryland nursing homes have much a better grade on providing care to patients and residents with dementia, in regard to vaccinations, and in improving or maintaining the daily functions of high acuity patients and residents.

The length of the AIT program in neighboring states is much shorter for an applicant with a health-related degree compared to Maryland's one-year, full-time AIT program that equates to 2,080 hours. In Virginia an applicant with a health-related degree needs to complete a 320-hour AIT. An applicant with similar background in Delaware must complete a six-month AIT equating to approximately 1,038 hours. In Pennsylvania, an AIT of 100 to 800 hours required. And, the AIT program requirement in New Jersey ranges from 875 to 1,750 hours.

In addition to this testimony, we have also included in our supporting materials the regulations and requirements to become a licensed nursing home administrator in surrounding states and various states in other parts of the country. For surrounding states, you will find the requirements in Delaware, New Jersey, West Virginia, and DC. We have also included, for reference and background, the requirements for Michigan, New Hampshire, Rhode Island, and Utah.

In summary, Senate Bill 909 will still require an AIT program ranging from twelve to six months. AITs will still be required to pass the licensure exam and the various character and background checks. The bill also requires BENHA to recognize interstate reciprocity for practicing nursing home administrators who are licensed in other states.

When comparing Maryland's licensed nurse home administrator requirements with other states that have varying requirements, we find little correlation between nursing home administrator licensure requirements and quality of care data. And, considering persisting workforce challenges we face, it is critical that we establish innovations to provide the opportunity for new and experienced nursing home administrators in Maryland. While this bill alone will not solve all of the workforce challenges that we face in long-term care, this legislation is an important step forward in achieving this goal.

Again, we commend and thank sponsor for bringing forth this important and timely legislation. We request a favorable report from the Committee on Senate Bill 909.

Submitted by:

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

Table 1: Quality of States with Lower Requirements for Licensed Nursing Home Administrators

This table compares three states (MI, MN, RI) that have less strict requirements with three states (NJ, MD, NH) that have more strict requirements. The data shows that states with lower requirements do not have more problems with healthcare quality and management. For example, states with lower requirements have lower turnover of RNs and administrators, and a 44% lower percentage of long stay residents with depressive symptoms compared with states with more strict requirements.

FACTORS	AVERAGE OF THREE STATES WITH FEWER REQUIREMENTS	AVERAGE OF THREE STATES WITH STRICTER REQUIREMENTS	STATES WITH LOWER REQUIREMENTS DO NOT HAVE MORE PROBLEMS IN QUALITY AND MANAGEMENT
Registered Nurse turnover	43.97	44.43	1% lower
Number of administrators who have left the nursing home	0.8	1.3	38% lower
Percentage of long stay residents whose need for help with daily activities has increased	15.33	17.42	12% lower
Percentage of long stay residents who lose too much weight	6.33	6.43	1.6% lower
Percentage of low risk long stay residents who lose control of their bowels or bladder	47.76	49.56	3.6% lower
Percentage of long stay residents who have depressive symptoms	3.90	6.93	44% lower
Percentage of long stay residents who were physically restrained	0.11	0.19	40% lower
Percentage of long stay residents whose ability to move independently worsened	23.77	25.93	8.3% lower
Percentage of long stay residents whose ability to move independently worsened	23.77	26.69	11% lower
Percentage of long stay residents who received an antianxiety or hypnotic medication	15.36	18.03	15% lower
Percentage of short stay residents who made improvements in function	76.09	73.89	3% higher

Table 2: Does Maryland have higher quality compared to states with fewer requirements for licensed nursing home administrators?

Despite stricter requirement for licensed nursing home administrators, Maryland has not performed better than the states with fewer requirements. For example, Maryland had 57% higher health deficiencies, on average, compared to the three states with fewer requirements (MI, MN, and RI).

FACTORS	MARYLAND	AVERAGE OF THREE STATES WITH FEWER REQUIREMENTS	MD STRICTER REQUIREMENT DOES NOT RESULT IN BETTER QUALITY
Average health deficiencies	13.77	8.77	57% higher
Registered Nurse turnover	46.6	43.97	6% higher
Number of administrators who have left the nursing home	1.6	0.8	Twice the rate
Percentage of long stay residents whose need for help with daily activities has increased	20.59	15.33	34% higher
Percentage of long stay residents who lose too much weight	7.11	6.33	12% higher
Percentage of low risk long stay residents who lose control of their bowels or bladder	62.23	47.76	30% higher
Percentage of long stay residents who have depressive symptoms	9.92	3.90	154% higher
Percentage of long stay residents who were physically restrained	0.15	0.11	32% higher
Percentage of long stay residents assessed and appropriately given the pneumococcal vaccine	92.97	94.28	1.38% lower
Percentage of short stay residents assessed and appropriately given the pneumococcal vaccine	78.41	81.05	3.25% lower
Percentage of long stay residents whose ability to move independently worsened	33.10	23.77	39% higher
Percentage of high risk long stay residents with pressure ulcers	10.39	7.77	34% higher
Percentage of short stay residents who made improvements in function	73.09	76.09	4% lower

Table 3: Quality Metrics Comparison

STATE	AVERAGE HEALTH DEFICIENCIES	TOTAL NURSING STAFF TURNOVER	NUMBER OF LNHA'S WHO HAVE LEFT THE NURSING HOME	NUMBER OF FINES	% LONG STAY RESIDENTS WHOSE NEED FOR HELP WITH DAILY ACTIVITIES HAS INCREASED	% LONG STAY RESIDENTS EXPERIENCING ONE OR MORE FALLS WITH MAJOR INJURY	% HIGH RISK LONG STAY RESIDENTS WITH PRESSURE ULCERS	% SHORT STAY RESIDENTS REHOSPITALIZED AFTER ADMISSION	% SHORT STAY RESIDENTS OUTPATIENT ED VISIT	NUMBER OF HOSPITALIZATIONS PER 1000 LONG-STAY RESIDENT DAYS	NUMBER OF OUTPATIENT ED VISITS PER 1000 LONG-STAY RESIDENT DAYS
Michigan	13.2	50.4	1.1	2.4	13.46	2.92	8.74	23.73	10.03	1.32	0.69
Minnesota	8.2	48.3	0.5	1.9	14.01	4.34	6.81	22.49	11.85	1.30	0.81
Rhode Island	4.9	45.4	0.8	1.7	18.54	3.90	7.77	24.27	10.80	1.21	0.65
Colorado	8.63	56	1.4	2.6	15.85	3.52	5.92	19.35	10.29	0.95	0.73
Georgia	3.97	53.7	0.8	1.4	18.27	3.13	10.75	22.36	11.12	1.63	0.88
North Carolina	5.9	53.8	1	1.4	20.39	3.80	10.21	21.46	11.38	1.37	0.84
West Virginia	10	51.7	0.7	0.8	17.59	4.21	8.77	20.16	11.07	1.29	0.87
Utah	9.6	58.5	1.4	2	13.26	3.22	5.79	17.48	9.51	0.84	0.55
District of Columbia	14.37	37.8	1	1.3	17.24	0.98	10.69	16.95	6.43	0.84	0.33
Delaware	13.73	49.2	0.8	1.4	16.03	3.35	6.03	20.32	9.62	1.37	0.66
New Jersey	4.03	41	1.4	1.4	11.57	2.55	9.94	24.45	7.85	1.47	0.51
Maryland	13.77	43.5	1.6	1.2	20.60	2.95	10.39	21.42	8.16	1.01	0.52
New Hampshire	3.366666 67	49.5	0.9	1	20.10	5.01	6.32	19.38	11.88	1.15	0.75

Table 4: Licensed Nursing Home Administrator Requirements

STATE	MINIMUM AGE REQUIREMENT	EDUCATION LEVEL	AIT PROGRAM HOURS	MINIMUM MONTHS TO COMPLETE AIT
Michigan ¹	NA	9 semester credits	0	0
Minnesota ²	NA	Bachelors	0	0
Rhode Island ³	18	Bachelors	350	2
Colorado ⁴	NA	2 years of college level study	500-1000	3
Georgia ⁵	21	Bachelors/Masters/Doctorate	500-2000	3-12
North Carolina ⁶	18	2 years of college level study	NA	3
West Virginia ⁷	21	College degree	1000	5
Utah ⁸	NA	Bachelors	1000	5
District of Columbia ⁹	18	Bachelors/Masters	(1 year)	6-12
Delaware ¹⁰	NA	Bachelors/Masters	1200-2400	6-12
New Jersey ¹¹	21	Bachelors	875-1750	9
Maryland¹²	21	Bachelors/Masters	2,080	12
New Hampshire ¹³	21	Bachelors	NA	12

Sources

- 1 https://www.michigan.gov/documents/lara/Nursing_Home_Administrator_517650_7.pdf
- 2 <https://mn.gov/boards/nursing-home/applicants/nha-info/requirements/>
- 3 <https://health.ri.gov/applications/NursingHomeAdministrator.pdf>
- 4 <https://drive.google.com/file/d/0B-K5DhxXzBzSFFHOUVRTXh3aFE/view?resourcekey=0-B-ayvoSNcwxBxmz9Z41eDQ>
- 5 <https://casetext.com/regulation/georgia-administrative-code/departments-393-rules-of-georgia-state-board-of-long-term-care-facility-administrators/chapter-393-4-administrator-in-training/rule-393-4-02-administrator-in-training-ait-program-requirements-amended>
- 6 <http://ncbenha.org/rules/Rules.pdf>
- 7 <https://apps.sos.wv.gov/adlaw/csr/readfile.aspx?DocId=53179&Format=PDF>
- 8 <https://adminrules.utah.gov/public/search/R156-15-101/Current%20Rules,Proposed%20Rules>
- 9 <https://doh.dc.gov/sites/default/files/dc/sites/doh/publication/attachments/Nursing%20Home%20Administration%20Regulation%20September%2027%202013.pdf>
- 10 <http://delcode.delaware.gov/title24/c052/sc02/index.html>
- 11 <https://nj.gov/health/healthfacilities/certification-licensing/nursing-home-adm/>
- 12 <https://health.maryland.gov/bonha/Pages/licensing.aspx>
- 13 http://www.gencourt.state.nh.us/rules/state_agencies/nuh100-500.html

Licensed Nursing Home Administrator Requirements in Surrounding States

DELAWARE

In Delaware, you may become a licensed nursing home administrator by completing a Board-approved course of study in nursing home administration. Applicants also need to meet one of the educational and experience requirements of the Board, including:

- a. Having received a baccalaureate or graduate degree from an accredited college or university with a major in health and human services, hospital administration, nursing, or business administration; has been registered by the Board; and successfully completed a 6-month, pre-approved nursing home AIT program under the direct supervision of a Board-approved preceptor; or
- b. Having received a baccalaureate or graduate degree in a field other than health and human services, hospital administration, nursing, or business administration; has been registered by the Board; and successfully completed a 9-month, pre-approved nursing home AIT program under the direct supervision of a Board-approved preceptor; or
- c. Having received an associate degree in any field from an accredited college or university, or holding a current Delaware license as a registered nurse; has been registered by the Board; and successfully completed a 12-month, pre-approved nursing home AIT program under the direct supervision of a Board-approved preceptor;

Applicants must achieve a passing score on all examinations prescribed by the Board. They should not have not received any administrative penalties regarding that applicant's own practice as a nursing home administrator. Applicants should not have any impairment related to drugs or alcohol that would limit the applicant's ability to act as a nursing home administrator in a manner consistent with the safety of the public; and should not be adjudicated mentally incompetent by any court or administrative entity under any circumstances that would limit the applicant's ability to act as a nursing home administrator in a manner consistent with the safety of the public.

Delaware LNHA by Endorsement

Applicants must provide proof of current licensure in "good standing" in another state whose standards for licensure are substantially similar to those of this State. For states whose standards are not substantially similar to those of this state, the applicant should have practiced in that state for a minimum of 3 years after licensure.

Regulations and Specifics in Delaware:

[Nursing Home Administrator Licensure - Division of Professional Regulation - State of Delaware](#)
[5200 Board of Examiners of Nursing Home Administrators \(delaware.gov\)](#)

Requirements for All Applicants

These requirements are for all applicants regardless of if you applying by reciprocity or AIT.

In addition to submitting the application and fee in **DELPROS**, you must submit:

- An official transcript showing your degree, sent directly from the college/university to the Board office.
- Verification of your NAB Examination scores sent directly to the Board office from the [National Association of Long Term Care Administrator Boards \(NAB\)](#).
 - If you are applying by AIT but have not yet taken the exam, be sure to request NAB to send your scores to Delaware when you register for the exam.
 - If you are applying by AIT and have already passed the exam, request a score transfer only if you did *not* request NAB to send your scores to Delaware when you registered.
 - If you are applying by reciprocity, you must request a score transfer.
- State of Delaware and Federal Bureau of Investigation criminal background checks (CBC). Follow the instructions on the [Criminal History Record Check Authorization](#) form to arrange to be fingerprinted. Submit the forms and payment to the State Bureau of Identification (SBI). Do **not** send these forms to the Board office.
 - Allow **at least four weeks** for the SBI to send criminal history records to the Board office.
 - A new criminal background check is required even if the person recently had a criminal background check done for some other reason.
- State/Jurisdiction Licensure Verification sent directly to the Board office from **each** state or jurisdiction in which you currently hold or have ever held a license.
- A resume or separate page thoroughly describing your **occupational background**. The document must list all post-degree positions you have held, starting with your current position. All time must be accounted for. If you have been involved in an academic residency or internship or in a Board-approved AIT program, include the following information:
 - dates of employment
 - title of position
 - name and address of employer or organization
 - employer/organization telephone number and email
- A resume or separate page thoroughly describing all past **administrative experience** that you acquired in a residential facility providing protective, preventive and personal care services performed by qualified personnel. (Personal care refers to the general supervision of and direct assistance to individuals in their activities of daily living.)
 - Your experience **must** include:
 - administration of services to more than one person,
 - administrative services which have (or had) as a major component the supervision of more than one profession or discipline,
 - administrative positions in which you have (or had) direct responsibility for and are (were) held accountable for your own acts.
 - A description of your duties and responsibilities for the time periods when you supervised more than one profession or discipline. Include the dates and number of hours as well as the kinds of employees. Also, list the dates and hours for which you have served as acting administrator in the absence of the duly appointed administrator.

- In addition to the Requirements for All Applicants, you must provide proof of **at least 48 hours** of continuing education completed **within the past two years** prior to applying.

Reciprocity: *(There is more to this and the details are on the website link above)*

- In Delaware there are a limited number of states for whom they will accept reciprocal licensure: Pennsylvania, Maryland, New Jersey, Ohio, Connecticut, South Carolina, New York, New Hampshire, Washington
- Or hold a current hold a **current** NHA license in one or more jurisdictions **not** listed above but do **not** have three years of active NHA practice experience in any one of those jurisdictions
- hold a **current** NHA license in another jurisdiction where you have three years of active NHA practice experience

*For the last two bullets the board will review and approve or deny the application based on whether or not the other jurisdiction's licensure standards are substantially similar to Delaware.

NEW JERSEY

(a) An applicant for a license as a nursing home administrator shall:

1. Be at least 21 years of age;
2. Be a citizen of the United States or have declared the intent to become same;
3. Have, at a minimum, a baccalaureate degree from an institution of higher learning;
4. Have served as an administrative intern in a nursing home with no fewer than 60 beds for at least 1,750 hours at a rate of no more than 50 hours per week.
 - i. This service may have been performed on a part-time basis;
 - ii. This service shall not have been completed more than two years prior to the submission of the application for examination;
5. Have successfully completed 100 seminar or course hours in areas relevant to long term care administration as determined by the Board;
6. Be of good moral character as required in N.J.S.A. 30:11-13; and
7. Have passed an examination approved by the Board for the licensing of nursing home administrators.

§ 8:34-4.2 Administrative intern training program

(a) The Board shall review an administrative intern training program prior to an individual beginning a program and shall approve the program if the program complies with (b) through (g) below and is:

1. Conducted in a nursing home with no fewer than 60 beds;
2. Under a preceptor of whom the Board has approved in accordance with N.J.A.C. 8:34-4.3;

3. For a period of 1,750 hours, or as required by the Board after evaluation of an applicant's education and experience based upon the requirements contained in this chapter; and

4. With a minimum of 875 hours, or half of the hours required by the Board, served while a licensed administrator is on the premises of the nursing home.

And, they must complete a criminal background check.

WEST VIRGINIA

1. Pass the NAB exam and a state exam
 - In order to sit for exam, need to have following
 - a. Be at least 21
 - b. College degree
 - c. Possess medical, communicative, and emotional ability to handle position
2. Background Check
3. Pass a Personal Interview with Licensing Board
4. Have completed an AIT program
 - a. 1000-hour AIT program
 - b. Under the supervision of an approved nursing home administrator
 - c. INTERESTING NOTES: AIT can't work separate job outside the AIT program. AIT has to work varying shifts, including outside of normal business hours. Supervising Admin has to give quarterly reports. AIT pays fees at beginning and end of the program.
 - d. WAIVER: May get the 1000-hour AIT program waived if meet ANY of the following:
 - i. College degree program had at least 12 hours of health care management AND completed 1000 hours experience in an in-patient health care facility;
 - ii. Have a degree, and worked in an Assistant Admin for at least 3 years (or equivalent position like DON, ADON, or Director of Social Services);
 - iii. Have a degree from an approved NAB college program with internship or equivalent degree program in Health Care Admin with an internship program.

Also, WV rules do provide for an emergency permit for up to 6 months for an Acting Administrator should the licensee leave the facility. This emergency permit waives a lot of the requirements, including notably the AIT hours.

In sum, WV has similarities to MD and others. But WV also has some nuances, especially as it relates to waivers of AIT requirements.

DISTRICT OF COLUMBIA

GENERAL REQUIREMENTS FOR ALL APPLICANTS

- A. Applicant must not have been convicted of an offense, which bears directly on the applicant's fitness to be licensed.
- B. Applicant must be at least 18 years of age.
- C. Applicant shall submit the following: 1. A complete and signed application form; 2. Two (2) recent passport type photographs of the applicant's face measuring 2" x 2";

D. Comply with all other applicable requirements set forth in these instructions (See Checklist for all required documents).

E. Application Fees

F. Background check

EDUCATIONAL REQUIREMENTS FOR APPLICANTS EDUCATED IN THE UNITED STATES, TERRITORY OR COUNTRY

A. An applicant for a license to practice as a Nursing Home Administrator must have received a **baccalaureate degree** from an institution accredited by the Secretary of the U.S. Department of Education or the Council on Postsecondary Accreditation, which must include the following courses:

B. That the applicant meets one of the following requirements:

1. **Administrator in Training (AIT)** – Applicant has worked for at least 1 year during or after completion of the baccalaureate program in a nursing home licensed in the District under the general or immediate supervision of a nursing home administrator which meets the practical experience requirements below of these instructions.

2. Has worked for at least **one (1) year during or after completion of the baccalaureate program in a nursing home licensed in the District under the general or immediate supervision of a nursing home administrator** which work meets the requirements listed in § 6202.4, by submitting with the application a signed statement from each supervisor and preceptor, as required in § 6202.5; or

3. Applicant has earned a **master's degree** in a program accredited by the Accrediting Commission on Education for Health Services Administration (ACHESA) which meets one of the following requirements:

a. The program included an experiential component in a licensed nursing home or

b. The program was supplemented by employment in a licensed nursing home for six (6) months during or after completion of the master's program, which employment was under the general or immediate supervision of a nursing home administrator, and which meets the practical experience requirements in the practical experience requirements below of these instructions.

PRACTICAL EXPERIENCE REQUIREMENTS

A. The practical experience required for applicants in the Educational Requirements section above of these instructions shall:

1. Include practice under general supervision averaging at least 35 hours per week, 2 hours per week of which shall be under immediate supervision; and

2. Encompass all aspects of the practice of nursing home administration

3. If the applicant demonstrates by education or professional experience that any portion or all of the practice experience required under § 6202.1(c) has been met, the Board, in its discretion,

may approve up to one thousand (1000) hours of practical credits toward the Administrator In Training Program (A.I.T.). The Board may award credit for prior experience if the experience was received within the immediately preceding five (5) years and in one (1) of the following areas:

- (1) Assistant administrator in a hospital;
- (2) Hospital administrator;
- (3) Assistant administrator or a department head in a licensed nursing home;
- (4) Nursing home administrator licensed in another state;
- (5) Resident or intern in a program offered by an accredited college or university for the purpose of satisfying the requirements for a baccalaureate or master's degree in health care administration;
- (6) An A.I.T. program in another state, if the program is substantially comparable to the A.I.T. program in the District of Columbia, as determined by the Board, and the individual successfully completed the program;
- (7) Executive director of a continuing care retirement community;
- (8) Assisted living manager;
- (9) Health-care-related senior management official; or
- (10) Non-health-care-related senior management official.

APPLICANTS EDUCATED IN FOREIGN COUNTRIES

A. The Board may grant a license to practice nursing home administration to an applicant who completed an educational program in a foreign country if the applicant:

1. Meets all requirements for licensure except for educational requirements for applicants educated in the U.S. and
2. Demonstrates to the satisfaction of the Board that the applicant's education and training are substantially equivalent to the requirements by submitting one of the following:
 - a. Proof satisfactory to the Board that the applicant has received the required degree from a foreign institution that was accredited, at the time the degree was conferred, by an accrediting body recognized by the national government of the country in which the institution is located or Page 4
 - b. A certification form a private education evaluation service approved by the Board that the applicant's foreign education is substantially equivalent to the education required by Chapter 62, Title 17, DCMR.
3. If any document is in a language other than English, an applicant shall arrange for its translation into English by a translation service acceptable to the Board and shall submit a translation signed by the translator attesting to its accuracy

EXAMINATION REQUIREMENTS — NATIONAL EXAMINATION

A. To qualify for a license, an applicant must receive or have received a passing score of 75% on the licensing examination sponsored by the National Association of Boards of Examiners for Nursing Home Administrators (NAB). An applicant shall not be eligible to take the NAB or District examination until all other requirements for licensure are met.

B. An applicant who fails the NAB on three (3) consecutive attempts shall not be permitted to take another NAB for one (1) year following the third failure. Thereafter, the applicant shall not be permitted to take the NAB for one year after each failure.

C. It is the applicant's responsibility to arrange to have his/her NAB examination results sent directly from the testing service to the Board.

NO EXCEPTIONS can be made.

DISTRICT EXAMINATION

D. To qualify for a license, all applicants must receive a passing score on a written examination on laws and rules pertaining to the practice of nursing home administration (the District examination) and shall sit for an interview with the Board.

E. An applicant who fails the District Exam on three (3) consecutive attempts shall not be permitted to take another District Exam for one (1) year following the third failure. Thereafter, the applicant shall not be permitted to take the District Exam for one year after each failure.

F. The interview may include oral questions from Board members regarding the applicant's past and present experience relating to the practice of nursing home administration.

G. The District examination is offered on the third Thursday in January, April, July, and October each year. Applications must be received at least 90 days prior to the date of examination.

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Steps to Become a Licensed Nursing Home Administrator

Examples: Michigan, New Hampshire, Rhode Island, and Utah

MICHIGAN

In Michigan, you may become a licensed nursing home administrator by passing the National Core of Knowledge Exam for Long Term Care Administrators (CORE) and the National Nursing Home Administrators Line of Service Examination (LOS). In addition, the applicants must either submit a:

(1) Certification of Nursing Home Administrator Education form indicating completion of a minimum of 9-semester credits or 144-hours of instruction which includes all of the approved subjects: Administrative management of a nursing home; Human resources management in a nursing home; Financial management of a nursing home; State and federal laws and regulations regarding the nursing home industry, Operation of a nursing home, emergency preparedness, including Medicare and Medicaid provider compliance with the requirements of the Life Safety Code, and the protection of patients' health, safety, and welfare in a nursing home Gerontology or the aging process; and Identification of elder abuse and neglect.

Or

(2) Certification of employment form submitted by the director of the Michigan-licensed hospital where the applicant has been employed as a chief executive or administrative officer for not less than 5 of the 7 years immediately preceding the date of the application.

All applicants need to complete an online application, a criminal background check, a good moral character questionnaire, and complete a training in identifying victims of human trafficking. The applicants must provide their social security number. Verification of licensure will be required for applicants that hold a current license or ever held a license as a nursing home administrator.

All applicants need to demonstrate a working knowledge of the English language. This can be established if the required health professional educational program was taught in English, the applicant's transcript establishes that they earned not less than 60 college-level credits from an English-speaking graduate or undergraduate school, or pass an approved English proficiency exam.

Michigan LNHA by Endorsement

Complete an online application, a criminal background check, a good moral character questionnaire, and complete a training in identifying victims of human trafficking. Establish working knowledge of English language by either (1) showing required health professional educational program was taught in English, (2) applicants transcript establishes that they earned not less than 60 college-level credits from an English-speaking graduate or undergraduate school, or (3) pass an approved English proficiency exam. The

applicants must provide their social security number. Verification of licensure will be required for applicants that hold a current license or ever held a license as a nursing home administrator.

If the applicant has been licensed less than 5 years in another state prior to applying for a Michigan license, they must also have a Certification of Nursing Home Administrator Education form submitted by their accredited educational institution indicating completion of a course of instruction that is a minimum of 9-semester credits or 144 clock hours of instruction and must include all of the following subjects: 1) Administrative management of a nursing home; 2) Human resources management in a nursing home; 3) Financial management of a nursing home; 4) State and federal laws and regulations regarding the nursing home industry, 5) Operation of a nursing home, emergency preparedness, including Medicare and Medicaid provider compliance with the requirements of the Life Safety Code, and the protection of patients' health, safety, and welfare in a nursing home; 6) Gerontology or the aging process; and 7) Identification of elder abuse and neglect.

NEW HAMPSHIRE

Applicants need a bachelor's degree from an accredited college or university and should have completed a minimum of 15-semester credits from an accredited college or university in course work in the following core areas: Applicable standards of environmental health and safety; Local health and safety regulations; General administration; Psychology of patient care; Principles of medical care; Personal and social care; Therapeutic and supportive care and services in long term care; Departmental organization and management; and Community interrelationships.

Applicants must pass an examination set by the National Association of Long-Term Care Administrator Boards and an examination on New Hampshire Law RSA. Applicants are also required to satisfactorily complete one year of experience as administrator-in-training (AIT) in a nursing home of at least 50 beds or equivalent experience.

Applicants must submit a completed application, submit proof of the legal right to work in the United States, employment record, and three original letters of recommendation.

New Hampshire LNHA by Reciprocity

A nursing home administrator holding a valid license as a nursing home administrator issued by a state board of examiners is eligible for licensure in New Hampshire, provided that the applicant successfully passes the required examinations and the board determines that (1) The other state's standards are equal to or higher than this state's requirements; and (2) The other state gives similar recognition and endorsement to nursing home administrator licenses of this state.

Applicants must submit a certified copy of a current license issued by another state; certified transcripts of all post-high school courses taken and degrees secured; documentation of one year's related work experience as an administrator; three original letters of reference, each written within the last 12 months,

from unrelated persons who can attest to the applicant's moral and professional character; and documentation of legal right to work in the United States.

RHODE ISLAND

In Rhode Island, you may become a licensed nursing home administrator by completing a written NHA examination, with a minimum passing score of 113.

Applicants are required to provide proof of at least 18 years of age, two letters of good moral character, curriculum vitae, official school transcripts, and original Bureau of Criminal Identification and Investigation (BCI) check from the Rhode Island Attorney General's Office; if positive BCI, a detailed explanation is required.

All applicants need to have a Bachelor's degree in health care administration or a Bachelor's degree and completion of 15 credit hours for the required courses. All applicants also need to complete field experience of 350 hours within 12 months, in an Administrator-in-Training (AIT) capacity in a licensed nursing facility.

Rhode Island LNHA by Endorsement

Applicants are required to provide proof of at least 18 years of age, two letters of good moral character, curriculum vitae, official school transcripts, and original Bureau of Criminal Identification and Investigation (BCI) check from the Rhode Island Attorney General's Office; if positive BCI, a detailed explanation is required.

Applicants need to have a Bachelor's degree and 3 years of experience as a licensed nursing home administrator, within the most recent 5 years; or a Bachelor's degree and in a management position with no less than 3 years of experience, within the most recent 5 years, having direct responsibility for overseeing and directing 3 or more licensed nursing home administrators.

Applicants also need to provide evidence of a current license in good standing as an NHA in all alternate jurisdictions.

Rhode Island LNHA by ACHCA Certification

Applicants are required to provide proof of at least 18 years of age, two letters of good moral character, curriculum vitae, official school transcripts, and original Bureau of Criminal Identification and Investigation (BCI) check from the Rhode Island Attorney General's Office; if positive BCI, a detailed explanation is required.

Applicants need to provide a Notarized copy of Certificate from the American College of Health Care Administrators (ACHCA) and evidence of a current license in good standing as an NHA in all alternate jurisdictions.

UTAH

Applicants must complete an approved AIT preceptorship consisting of a minimum of 1,000 hours or hold a NAB Health Services Executive (HSE) credential; and

- (1) meet educational requirement of holding a baccalaureate degree from an accredited university or college. Up to 500 hours spent in an internship, practicum, or outside study program associated with a bachelor's degree in health facility administration or health care administration may be included as part of an approved AIT preceptorship.

OR

- (2) meet the experience requirement of completing at least 8,000 hours of qualifying experience approved by the Division in collaboration with the Board. At least 4,000 hours of the qualifying experience should be in a supervisory role.

Applicants must also pass NAB's two-part component examination for nursing home administrators.

Utah LNHA by Endorsement

Applicants must be currently a licensed health facility administrator in good standing in another state; pass NAB's two-part component examination for nursing home administrators, and either hold a baccalaureate degree or meet the experience requirement. The applicants also must have been employed as a health facility administrator in another state for three years. Additionally, they should have been employed as a health facility administrator at the same facility in another state for two consecutive years; or hold Health Services Executive (HSE) qualification from the National Association of Long-Term Care Administrator Boards (NAB).

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Michael Smith SB 909 Testimony.pdf

Uploaded by: Michael Smith

Position: FAV



**TESTIMONY BEFORE THE
SENATE FINANCE COMMITTEE**

March 17, 2022

Senate Bill 909: Health Occupations -
Nursing Home Administrator – Qualifications

POSITION: FAVORABLE

On behalf of our team of healthcare heroes at Marquis Health Consulting Services, we appreciate the opportunity to express our support for Senate Bill 909. Marquis Health Consulting Services operates a total of five skilled nursing and rehabilitation centers and two assisted living campuses in Maryland.

My name is Michael Smith RN, LNHA, and I am the Division President at Marquis Health Consulting Services, and a proud member of the HFAM Board of Directors. Most importantly, and a source of professional pride for me, I am both a registered nurse and a licensed nursing home administrator.

I feel fortunate to have begun my career in our sector by caring for patients and residents as a nursing assistant in Pennsylvania. I went on to become a Registered Nurse in 1996 and a licensed nursing home administrator in 2006. I am not a licensed nursing home administrator in Maryland because the current reciprocity provisions and Administrator-in-Training (AIT) program requirements make my quick licensure unlikely.

Pennsylvania has less strict licensure requirements than Maryland, so reciprocity is unlikely under the current law. To become licensed in Maryland, I would likely be required to take an AIT program of nine to twelve months despite my professional experience. I am not at a place in my career where that would be the best use of my strengths.

Marquis Health Consulting Services operates a total of 51 centers in seven states. Those states are Massachusetts, Maryland, Pennsylvania, Virginia, Florida, Rhode Island, and New Jersey. Like most states, Maryland does provide for emergency provisional licensure of completely non-licensed individuals. However, Maryland's current law regarding reciprocity and the one-year AIT program is a barrier for companies like ours who operate in many states to bring in new talent to Maryland.

This proposed legislation would provide a clearly defined path for professionals working in nursing homes and healthcare to access licensure reciprocity, and to earn AIT credit for their professional experience, all while keeping in place the existing education and testing requirements.

This legislation authorizes an individual who holds an active nursing home administrator license in good standing in another state to practice in Maryland if the individual has three years of experience as an administrator or six years of experience as an assistant administrator. The State Board of Examiners of Nursing Home Administrators (BENHA) must waive any education requirements for an individual who was licensed, remains in good standing, and practiced as an administrator for at least three years in another state. In addition, this legislation authorizes an individual to satisfy criteria for licensure if they meet certain education and professional requirements.



In other words, Senate Bill 909 expands the nursing home administrator workforce by allowing for more interstate reciprocity of qualified individuals between states. It also removes barriers to entry by giving professional credit to applicants who are licensed and experienced in another role, and to applicants who have a degree in healthcare or aging.

Even before the pandemic, the long-term and post-acute care sector in Maryland did not have a deep bench of licensed nursing home administrators. A big part of that is due to the state-to-state differences in licensure and reciprocity.

Lastly, in public hearings and work sessions on the House version of this bill, HB 1241, some have stated that nursing assistants and nurses do not make good administrators. My career, and the careers of countless others who began as a nursing assistant or nurse and went on to become an administrator, proves otherwise.

For these reasons, I respectfully request a favorable report from the Committee on Senate Bill 909.

Submitted by:

A handwritten signature in black ink, appearing to read 'Michael Smith', is written over a light green leaf graphic that is part of a larger decorative element in the bottom left corner of the page.

Michael Smith RN, LNHA
Marquis Health Consulting Services
(610) 772-4288

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Uploaded by: State of Maryland (MD)

Position: UNF



Board of Examiners of Nursing Home Administrators

Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Dennis R. Schrader, Secretary

Felicia W. Anthony, MBA, LNHA, Board Chair – Ciara J. Lee, MS, Executive Director
4201 Patterson Avenue, Baltimore MD 21215 | Phone: 410-764-4750

2022 SESSION POSITION PAPER

BILL NO: SB 909
COMMITTEE: Senate Finance
POSITION: OPPOSE

TITLE: Health Occupations – Nursing Home Administrator – Qualifications

BILL ANALYSIS: Senate Bill (SB) 909 establishes an exception to the requirement that an individual be licensed by the State Board of Examiners of Nursing Home Administrators before the individual may practice in this State for a person who holds a license in another state and has certain experience, while waiving certain education requirements; and alters the qualifications for applicants for a license to practice as a nursing home administrator.

POSITION AND RATIONALE: The State Board of Examiners of Nursing Home Administrators (the Board) opposes SB 909. The mission of the Board is to protect the citizens of Maryland and to promote quality health care in the field of long term care by:

1. Licensing and certifying nursing home administrators;
2. Receiving and resolving complaints from the public, courts, employers, insurance companies, other licensees regarding nursing home administrators who may have violated the Board's statute (Health Occupations Article, Title 9, Annotated Code of Maryland) and its regulations found under COMAR 10.33.01; and
3. Setting standards for the practice of nursing home administrators that reflect new and emergent developments in the practice of long term care through regulations and legislation.

SB 909 will allow an out-of-state licensed nursing home administrator candidate to be eligible for licensure in Maryland, while potentially having less professional experience as a Maryland nursing home administrator with knowledge of the State nursing home regulations. Decreasing one of the requirements of eligibility to apply for a nursing home administrator license in Maryland, from having **one (1) year** of full-time nursing home administration in a nursing home to only **nine (9) months**, does not correlate with the professional standard that Maryland upholds to protect its citizens. Essentially, this leaves opportunity for severe long term care facility deficiencies to emerge, contradicts the mission of the Board, and promotes unsuccessful operations leading to professional failure for a nursing home administrator candidate once licensed. This bill could potentially negatively affect the quality of care being provided to Maryland's nursing home residents.

It is noteworthy to highlight that there are various states that require more than **one (1) year** of nursing home administrator of record experience as a licensure eligibility requirement for out-of-state applicants. The Board of Long-Term Care Administration in Washington, D.C. requires an out-of-state licensee to have at least **three (3) years** of current practice as a nursing home administrator to be eligible to qualify for reciprocity and endorsement licensure (two (2) years more than Maryland's current requirement). In addition, the New York Board of Examiners of Nursing Home Administrators requires applicants holding an out-of-state nursing home administrator license to demonstrate verification that they have full-time (at least 35 hours per week) experience of **at least two (2) years in the preceding five (5) years** prior to submission of their application, as the administrator of record in an out-of-state nursing home; in which must be operated in full compliance with applicable state and federal laws.

In conclusion, the Board believes that out-of-state licensed nursing home administrators should adhere to the current provisions provided to become licensed in Maryland. Obtaining the appropriate credentials and experience to ethically serve the long term care population in the state is paramount. This bill minimizes the expectation and standards for nursing home administrator licensure applicants in Maryland, and weakens crucial protection of residents. Furthermore, the intention of the establishment of the exception and modified qualifications outlined in the bill are not explicitly stated to determine whether the purpose of the bill is to assist with adversities such as staffing and workforce shortages during the COVID-19 pandemic. For the above reasons, the Board is requesting an unfavorable report for SB 909.

For more information, please contact Ciara J. Lee, Executive Director for the Maryland Board of Examiners of Nursing Home Administrators, at 410-764-4749 or ciaraj.lee1@maryland.gov.

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

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Uploaded by: Stevanne Ellis

Position: UNF

SB909 Health Occupations – Nursing Home Administrator – Qualifications

Position – Unfavorable from the Office of the State Long-Term Care Ombudsman

March 16, 2022

As the State Long-Term Care Ombudsman, I advocate for the rights, quality of care and quality of life of long-term care residents. The nursing home administrator license requirements provide protections for the residents in Maryland. If this bill is passed, those standards would be weakened, sacrificing the oversight provided by well-qualified, trained administrators and the quality of care of residents in nursing homes. As a member of the State Board of Nursing Home Examiners of Nursing Home Administrators, I recommend that the Committee seek additional information from the Board.

Please note the following concerns:

- It would allow an assistant administrator from another state to become an administrator in Maryland. The qualifications for assistant administrators vary from state to state.
- The one-year requirement of full-time nursing home administration is decreased to nine months
- It allows nursing experience to replace the experience of nursing home administrator experience. Nursing experience is not the same as nursing home administrator experience. Nurses aide experience is not the same as the administrator.
- The internship option is not defined and an assisted living facility in one state is not the same as in others. Consequently, it would be difficult to know if training in an assisted living in Maine would prepare someone to work in Maryland.
- It requires the Board to waive an education requirement rather than give the Board the discretion to determine this on a case-by-case basis.
- Finally, the bill as written, is confusing and contradictory – it makes it difficult to become an administrator on one hand and reduces the standards on the other hand.

The most vulnerable residents in this state need and deserve the most qualified, well-trained administrators. This bill could result in putting residents at risk.

I do not support this bill as written, and I am recommending that the Committee consider doing the same.

Respectfully submitted,

Stevanne Ellis

Maryland Long-Term Care Ombudsman

