



11890 Healing Way
Silver Spring, MD 20904

March 27, 2025

The Honorable Senator Pamela Beidle, Chair
The Honorable Senator Antonio Hayes, Vice Chair
Senate Finance Committee
Miller Senate Office Building, 3 East Wing
11 Bladen Street
Annapolis, MD 21401

Subject: Opposition to House Bill 905 – Hospitals – Clinical Staffing Committees and Plans – Establishment

Dear Chair Beidle, Vice Chair Hayes, and Members of the Senate Finance Committee:

On behalf of Adventist HealthCare White Oak Medical Center (WOMC), I am writing to respectfully express our strong opposition to House Bill 905 – Hospitals – Clinical Staffing Committees and Plans – Establishment. We appreciate and share the legislature's goal of ensuring safe staffing in Maryland's hospitals. However, we believe the prescriptive approach mandated by HB 905 is unnecessary given our existing, successful practices and could unintentionally undermine the agile, patient-centered staffing processes we already have in place.

Proven Staffing Processes at WOMC:

WOMC currently employs several well-established processes to determine and adjust staffing levels in real-time. These include safety huddles at the beginning of each shift and a centralized bed control office that actively manages capacity and acuity to align with ongoing staffing needs. Additionally, departments use robust benchmarking from the Labor Management Institute to guide staffing levels according to best practices and standards.

At WOMC, initial staffing schedules for each care unit are set based on projected census data from year-over-year trends. A shared governance model, driven by frontline clinical staff—including nurses, patient care technicians, and unit support coordinators—guides recommendations for staffing needs and support. For specialty areas, frontline staff refer to their professional organizations for guidance on scheduling standards. For example, Emergency Department nurses follow staffing standards from the Emergency Nurses Association, while Surgical Services aligns staffing needs with guidelines from the Association of periOperative Registered Nurses.

The shared governance committee meets year-round, and WOMC has made several adjustments to staffing mix and ratios based on their input and recommendations. Additionally, we utilize a self-scheduling platform, enabling clinicians to request specific dates and shifts, which supports flexible staffing and aids in workforce recruitment and retention.

All of these tools and approaches are informed by standards from The Joint Commission and the Centers for Medicare & Medicaid Services (CMS), with an unwavering focus on patient safety and positive clinical outcomes.

Frontline Engagement and Excellence:

WOMC is a Pathway to Excellence® designated hospital by the American Nurses Credentialing Center (ANCC). Pathway to Excellence is a global credential highlighting an organization's commitment to creating a healthy work environment where nurses feel empowered and valued. To earn the Pathway to Excellence designation, organizations must demonstrate excellence in six key standards: shared decision-making, leadership, safety, quality, well-being and professional development. Nurses in Pathway to Excellence designated organizations are engaged in both policy and practice, resulting in higher job satisfaction, reduced turnover, improved safety and better patient outcomes. This designation further underscores our commitment to nurses and clinicians on determining optimal staffing levels for providing world-class care.

Real-Time Staffing Flexibility:

Our hospital needs can shift rapidly, and staffing plans at WOMC are reviewed and adjusted continually to reflect patient volume, acuity, and the availability and expertise of clinical staff. Our nursing supervisors and unit leaders make real-time decisions to reallocate resources and maintain safe care delivery. A single, centralized staffing committee, as proposed in HB 905, would not offer the speed or flexibility required to manage such rapidly evolving circumstances.

Clinical Expertise Must Guide Clinical Staffing:

Staffing decisions must be driven by clinical expertise. At WOMC, these decisions are made by experienced clinical leaders who understand the complexities of patient care. While non-clinical staff contribute valuable insights into operations and logistics, they should not be tasked with directing clinical staffing plans. Patient safety demands decisions informed by those who are actively engaged in delivering care. WOMC has a proven track record of providing safe patient care, as evidenced by a four-time hospital safety grade of "A" from The Leapfrog Group – an independent national nonprofit watchdog focused on patient safety – as well as recognition by the Maryland Patient Safety Center and other nonprofit safety and quality organizations.

Ongoing Investment in Workforce Development:

WOMC is committed not only to safe staffing today but also to building a sustainable, resilient workforce for the future. We operate a robust Leadership Institute, which provides development opportunities for emerging and seasoned leaders alike, fostering a culture of excellence and continuous learning. These efforts have produced measurable results. WOMC staff turnover has decreased significantly in one year, and employee engagement has risen to world-class benchmarks established by Press Ganey, which measures employee engagement for hospitals and health systems nationally. These achievements underscore our commitment to retaining skilled professionals and creating an environment where they thrive.

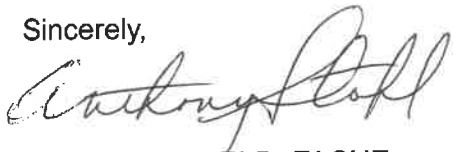
In Conclusion:

Adventist HealthCare White Oak Medical Center is proud of our ongoing work to ensure safe, high-quality care through thoughtful, responsive staffing practices. We strongly believe that HB 905, while well-intended, does not reflect the complexities of hospital operations and could impede our ability to respond quickly to patient needs.

For these reasons, **we respectfully urge an *Unfavorable* report on House Bill 905.**

Thank you for the opportunity to share our perspective and for your continued support of Maryland's healthcare institutions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anthony Stahl".

Anthony Stahl, PhD, FACHE
President, Adventist HealthCare White Oak Medical Center