

June 9, 2022

Re: FY 2023 Skilled Nursing Facility (SNFs) Prospective Payment System Rate Update and Quality Reporting Requirements (CMS-1765-P)

To Whom It May Concern,

The Alaska Hospital & Healthcare Association (AHHA) is a membership organization representing Alaska's hospitals, nursing homes, home health and hospice agencies, and other health care partners throughout Alaska's vast expanse. Our mission is to advance the shared interests of the health care industry to build an innovative, sustainable system of care for all Alaskans.

We are writing in response to the financial cuts and staffing mandates proposed by CMS. Nursing Homes in Alaska continue to face challenges exacerbated by the pandemic. Alaska's nursing homes are contending with a staffing crisis, decreases in the ability to care for more residents, and an increase in regulatory burdens. A 4.6% percent cut is high enough to threaten the viability of our facilities. In Alaska, that means the only skilled nursing facility in a community could close, leaving no other options accessible by road. Residents would need to travel by air or sea to find placement. We respectfully ask that you consider the current vulnerable state of the long-term care sector and phase in any cuts over a minimum of three years.

We also ask that CMS not introduce mandated staffing ratios during a national workforce crisis. America has lost over 380,000 health care workers since the start of the pandemic. Long-term care providers were hurt worse than any other provider type. We especially saw this with Certified Nurse Aides (CNAs) in Alaska.

The CNA workforce has faced many challenges during the COVID pandemic, including a decrease in the numbers of CNAs receiving clinical training due to facility restrictions, increased stress and pressure on the CNA workforce, vaccine requirements, and widespread fears related to COVID. CNAs are a critical part of the workforce providing much of the hands-on care in long-term care facilities. A severe shortage of CNAs has resulted in the reduction of beds available in nursing homes and the closure of entire units, which impacts facilities' ability to take new admissions from hospitals and meet the needs of the community.

We contracted with the State of Alaska to support and expand the CNA workforce by focusing on four key areas:

- Expand CNA training opportunities



- Develop and operate a communications campaign to recruit and retain CNAs (visit AlaskaCNA.org for information about training in jobs in Alaska.)
- Provide incentives for CNA retention and recruitment
- Develop a plan for a CNA apprenticeship program

We also created a Workforce Director position within our association. These efforts and partnerships will help us to address the workforce shortage, unfunded mandates will not. We ask for CMS to support facilities in building the workforce first rather than implementing a national minimum staffing requirement, which applies to all facilities without consideration for unique circumstance in Alaska. Implementation of mandatory staffing requirements without enough workers or funding jeopardizes our healthcare system.

Thank you for taking the time to consider these comments.

Sincerely,

A handwritten signature in blue ink that reads "Connie Beemer".

Connie Beemer MBA, PMP
VP, Post-acute Care & Finance

CC: U.S. Senator Lisa Murkowski
U.S. Senator Dan Sullivan