



April 8, 2024

Comments to Rule Set 2022-067 LR

The Health Care Association of Michigan (HCAM), which represents 358 skilled nursing facilities across the state, would like to offer support for and suggested improvements to rule set 2022-067 LR.

While HCAM supports the proposed rule set, including the education requirements, HCAM requests the new rules be implemented in a way that allows those currently receiving training through existing nursing home administrator programs to receive licensing. Recently, more than 50 individuals completed the course through Michigan State University, with nearly a dozen more scheduled to complete the course in December. Additionally, individuals who completed courses through Ferris State University and Madonna University.

These individuals availed themselves to these programs under the current NHA rules, and should not be prevented from licensure with the implementation of the new rule set. It would be appropriate – especially given the current workforce challenges – to grandfather these students to further encourage participation and pursuit of a career in long-term care.

To ensure these interested individuals are able to serve our state’s seniors, HCAM requests the clarifications stated above.

A handwritten signature in black ink that reads 'Rich Farran'.

Rich Farran
V.P. Government Services
Health Care Association of Michigan



March 8, 2024

Michigan Department of Licensing and Regulatory Affairs, Bureau of Professional Licensing

The National Association of Long Term Care Administrator Boards (NAB) is pleased to offer our support for the proposed changes to the Administrative Rules for Nursing Home Administrators - General Rule Set 2022-67 LR.

The NAB applauds the leadership of the Department of Licensing and Regulatory Affairs, Bureau of Professional Licensing, and the Michigan Board of Nursing Home Administrators in recognizing the qualification of candidates for licensure as Nursing Home Administrators that hold a current, valid health services executive designation (HSE) granted by the NAB as meeting the requirements of section 16186(1)(b) of the code, MCL333.16186.

The NAB established the HSE as an aspirational voluntary broad based qualification standard to support the following goals:

- Facilitate express licensure approval and transfer based on a common state standard
- Meet state licensure requirements for practice as an NHA, RCAL and/or HCBS administrator as required according to current state licensure requirements
- Promote consistency of the AIT and preceptor training experience across all jurisdictions
- Broaden academic programs to prepare graduates to meet the HSE qualification upon graduation

Adoption of the proposed rule changes align with the *White House Executive Order on Promoting Competition in the American Economy* and the *Federal Trade Commission's Policy Perspectives on Options to Enhance Licensure Portability Options* by removing barriers to licensure mobility.

HSE Qualified Nursing Home Administrators have demonstrated a broad base of comprehensive knowledge through education, experience and examination, their qualification to practice as Nursing Home, Assisted Living and Home and Community based leaders. The proposed rule changes will facilitate express candidate qualification and welcome some of the most highly qualified nursing home administrators in the nation to practice in the state of Michigan.

26 states have adopted the NAB HSE standard and we expect adoption in 30 states by June of 2024.

Thank you for the opportunity to submit NAB's comments in support of the proposed changes to the Administrative Rules for Nursing Home Administrators - General Rule Set 2022-67 LR.

Respectfully submitted,

A handwritten signature in black ink that reads 'Michelle B. Grachek'.

Michelle Grachek, President and CEO

A handwritten signature in black ink that reads 'Randy Lindner'.

Randy Lindner, CEO Emeritus

Archived: Wednesday, April 10, 2024 10:06:17 AM
From: [BPL-BoardSupport](#)
Sent: Tuesday, April 2, 2024 4:22:51 PM
To: [Marks, Dena \(LARA\)](#)
Subject: FW: Notice of Public Hearing - Nursing Home Administrators
Response requested: No
Sensitivity: Normal

From: Rumsey, Dean H. <dean.rumsey@corewellhealth.org>
Sent: Tuesday, April 2, 2024 2:04 PM
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Cc: Smith, Kimberly A.(Kim) <Kimberly.Smith@corewellhealth.org>
Subject: Notice of Public Hearing - Nursing Home Administrators

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Hello, I am writing to "comment" on the proposed rules elated to Nursing Home Administrators.

As a nursing home administrator, the following feedback is not directly related to a portion of the proposed rule but more so suggestions related to how continuing education requirements are obtained.

First, if possible, when MDHHS or any office constructs training opportunities for Nursing Homes in which the Nursing Home Administrator may attend, please consider obtaining continuing education units for this training. An example of this is the State funded Infection Control and Epidemiology training that MDHHS has arranged with the assistance of Association for Professionals in Infection Control and Epidemiology. This is very valuable and by offering CEU's, it may influence Administrators to attend. I mention this, as I did attend and pass the course and inquired of MDHHS and learned they did not and would not attempt to gain CEU approval.

Second, I would like to attend the meeting in person, but it is scheduled at the same date / time as the State of Michigan Joint Provider Surveyor Training session that is held by MDHHS and Administrators are influenced to attend. Hence, your schedules are in direct conflict, and this creates problems with our attendance.

Third, as you finalize the administrative rules, is there a way in which the continuing education requirements could be clearly listed? Even through a portal in which a third party such as NAB could list and then as we obtain these continuing education requirements it would reflect. Especially as NAB is the body who grants permission for courses to award CEU's to attendees.

Dean Rumsey, LHNA
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