



September 19, 2022

Heather Lang  
Director, Northeast Survey and Enforcement Division  
Centers for Medicare & Medicaid Services

Dear Director Lang:

On behalf of LeadingAge PA, the Pennsylvania Health Care Association (PHCA), and SEIU Healthcare Pennsylvania, we come together to voice our support for Pennsylvania's application to the Centers for Medicare and Medicaid Services for a state-wide waiver as outlined in QSO-22-15-NH & NLTC & LSC, revised on August 29, 2022, which will allow for temporary nurse aides (TNA) who are uncertified to continue to provide care until they can successfully be tested and credentialed as certified nurse aides.

Our organizations collectively advocate for the long-term care community, which includes residents, workers, and providers across the aging services continuum in Pennsylvania. The TNA program has been a lifeline to long-term care providers, residents, and workers alike in Pennsylvania. The halting of certified nurse aide training due to the pandemic and the escalating workforce crisis made it impossible for long-term care providers to effectively recruit and train vital frontline caregivers. This program was, and continues to be, an important component for ensuring long-term care communities and workers have the flexibility needed to provide quality care to older Pennsylvanians during one of the most challenging times in our country's history.

Since the release of QSO-22-15-NH & NLTC & LSC on April 7, this group has worked with the state and testing contractor, Credentia, to identify solutions that would help give temporary nurse aides the opportunity to become certified, as well as document attempts to obtain certification. Examples of this include recruitment efforts to fill the registered nurse (RN) proctor shortfall for the skills examination and the development of a standardized reporting form to help providers properly document attempts to get TNAs tested. Efforts have also been made to expand the amount of testing sites across the state, both at the regional and facility level. This group also partnered with the administration to send numerous communications to TNAs with ongoing updates and resources, as well as to providers to share best practices for helping TNAs get credentialed.

Unfortunately, widespread barriers persist despite these efforts. One of the main barriers is the ongoing lack of RN proctors available to staff testing centers. This has led to inconsistent test scheduling patterns for TNAs and caused a number of tests to be cancelled, and even rescheduled for after the October 6 deadline. The lack of proctors has also forced many TNAs to travel several hours to a testing site. As frustration grows, concerns mount that these workers, who stepped up during this challenging time to serve our most vulnerable citizens, may be forced to leave our sector altogether. The loss of these individuals will only serve to further exacerbate the workforce crisis and limit access to care and services. Nevertheless, our group is encouraged by the state's action of applying for this waiver, which could not come at more critical time.

We stand strong in our joint commitment to helping our members and workers get all TNAs tested and on the registry as certified nurse aides. Our group will continue to work with the administration and

appropriate departments to achieve these goals, and we fully support the state's decision to apply for this waiver and urge your approval. Thank you for your consideration of this request.

Sincerely,



Garry Pezzano  
President & CEO  
LeadingAge PA



Zach Shamberg  
President & CEO  
Pennsylvania HealthCare Association



Matthew Yarnell  
President  
SEIU Healthcare PA