



Sept. 23, 2022

VIA EMAIL

Mark Furnish, Division Director for the Center for Long-Term Care Licensure, Planning & Finance  
Office for the Aging and Long Term Care  
New York State Department of Health  
875 Central Avenue  
Albany, NY 12206

Dear Mr. Furnish:

Thank you for the opportunity to serve in the Nurses Across New York Stakeholder Workgroup. This initiative is critical given the current shortage of nurses and the growing need. As LeadingAge New York has voiced in our participation the Workgroup, it is critical that long term care be included and prioritizing in this program. We use the term "long term care" in the broad sense to include nursing homes, home care, PACE, adult day health care, and assisted living.

Specifically, we urge the program to consider the patients and residents of long term care settings to be deemed as underserved populations, regardless of where they are located. The statute allows for eligibility if a nurse practices in settings that primarily serve an underserved population, without regard to whether the population or the facility or office is located in an underserved area. Additionally, "underserved areas" include medically underserved populations. Lastly, the statute allows for the inclusion of other populations as determined by the commissioner. Given these parameters, we believe that people served in long term care settings can and should be recognized as "medically underserved populations" or populations otherwise worthy of prioritization by the Commissioner, for the purposes of eligibility for the program.

As has been highlighted during the discussions of this workgroup, long term care settings and services struggle to recruit and retain nurses. In New York, 72 percent of all nursing home days are paid for by Medicaid. These settings simply cannot compete for workforce with other providers because they rely so heavily on Medicaid for their reimbursement. As was discussed in the workgroup meetings, many nurses historically have used the nursing home as a setting to get experience and ultimately go to a higher paying setting. In some communities, hospitals and other higher paying settings are now hiring nurses directly out of school, given the current staffing shortages across the state. These shortages are felt even more acutely in rural populations, where providers describe the staffing shortages as dire. The added layer of a growing aging population in New York creates a frightening scenario in which access to care will be jeopardized. It should also be noted that workforce shortages in long term care settings and services not only create challenges for older adults and their families--they have ripple effects throughout the health care system. We *must* build in incentives to bring people to the field, and stay; *now*.

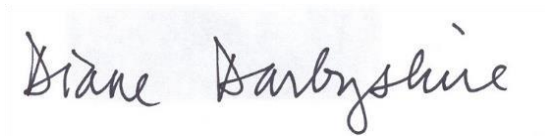
For these reasons, LeadingAge NY urges the Department to:

- include long term care settings and services as allowable settings in which a nurse could work to be eligible for the loan repayment program when working in underserved areas; *and*,

- to explicitly recognize that patients and residents of long term care services are underserved populations and nurses committing to work in a long term care setting for three years should make them eligible for the loan forgiveness program.

Thank you for your work on this program, and for your consideration on this matter.

Sincerely,

A handwritten signature in black ink that reads "Diane Darbyshire". The signature is written in a cursive style with a small mark above the 'i' in "Diane".

Diane Darbyshire, LCSW  
Vice President for Advocacy and Public Policy

Cc: Karen Madden