



July 15, 2020

Submitted by email to: sharp.inquiry@alaska.gov

The Alaska State Hospital and Nursing Home Association (ASHNHA) is submitting comments on the Department of Health and Social Services proposed changes to regulations 7 AAC 24: Health Care Professionals Workforce Enhancement Program.

ASHNHA supports SHARP 3 Health Care Professionals Workforce Enhancement Program as a public-private partnership. We support the purpose of the program to increase access to health care services for all Alaskans by improving recruitment, retention and distribution of health care professionals by providing financial support-for-service through loan repayment or direct incentive to health care professionals to serve all Alaskans, especially the underserved.

Overall we support the proposed regulations and have a few specific comments on details in the proposed regulations as outlined below

7 AAC 24.110. Employer site eligibility. *A site must meet the following requirements to participate in the program:*

- (1) ensure that the health care professional charges for provided services at the usual and customary rates in the employer's area, except that if a service recipient is unable to pay such fee, that individual will be charged at a reduced rate or not charged any fee.*

We would recommend adding the following language to this item: **or there is a hospital charity care process available for patients unable to pay.** Explanation: Most hospitals do not reduce rates or offer sliding fee scales but do have charity care policies that are available to individuals unable to pay.

7 AAC 24.150. Program Fees.

We support the addition of administrative fees and a fiscal agent fee to help cover the administrative cost of program. Time will tell if the fees charged are a deterrent to employer participation in the program. We hope they will not reduce participation by employers. The higher the fees the more likely they are to reduce the benefit employers will get by participating in state workforce enhancement program compared to paying an incentive or loan repayment directly to an employee.

Article 2. Advisory Council

ASHNHA supports the continued use of an advisory council to guide the development of the program. The additional clarifications provided by the regulations will strengthen the work of the council.

7 AAC 24.400. Definitions

(8) “full-time position” means a program-eligible position in which the health care professional works at least 40 hours per week in at least one contract-specified site; the 40 hours per week may occur in no less than four days per week, with no more than 12 hours of work to be performed in any 24-hour period; the health care professional may be a full-time employee but have only half-time program participation;

Comments on the definition of “full-time position. Hospitals may rely on 12 hour shifts to staff the hospital. In this case health care professionals working full-time may work three 12 hour shifts in a week with 36 hours per week meeting the requirement for full-time by the hospital. Change the definition of full-time to allow a health care professional to be considered full-time based on the employer’s policy and definition of full-time rather than a specific number of days/week or hours.

Thank you for the opportunity to provide comments on the proposed regulations.

Sincerely,

A handwritten signature in blue ink that reads "Jeannie Monk".

Jeannie Monk
Senior Vice President