

**Date:** April 3, 2024

**Subject:** CEO Connection: Why Are We Talking to OMB?

**Preview text:** What are we telling them?



Good morning,

This week, three of our member CEOs — David Gehm of Wellspring Lutheran Services (Michigan), Stephanie Chedid of Luther Manor (Wisconsin) and Jason Cronk of Immanuel Living (Montana) — and I met with the Office of Management and Budget (OMB) to share why we oppose the proposed [minimum staffing rule for skilled nursing facilities](#).

### **Why OMB?**

OMB is responsible for implementing the regulatory objectives of the White House. While all indications are that the administration will move forward, it is important that our comments and recommendations become part of the public record.

### **Why us?**

- **We are a credible messenger** — across the network we consistently provide quality care as measured by star ratings, clinical outcomes and staffing ratios.
- We serve the underserved — **all the constituents of Medicaid**.
- Many of our members already meet the proposed rule but **in rural and underserved communities, this rule will accelerate nursing home closures**.

**This is about people. When Medicaid providers are forced to close, people who rely on Medicaid, the truly vulnerable in our country, go without care.**

### **Our concerns about the proposed rule:**

- It does not address the dual challenges of chronic Medicaid underfunding and rising labor costs.
- It will accelerate nursing home closures.
- Implemented in combination with the proposed [Medicaid Access to Care Rule](#), which mandates staffing ratios for home- and community-based services, means access to quality care and choice for older adults and other Medicaid recipients in all settings will become more and more limited.

**We offer solutions:**

- 1) Flexibility — skilled nursing facilities should be able to set appropriate staffing levels based on their actual needs.
- 2) Increase Medicaid reimbursement rates.
- 3) Accelerate pathways allowing foreign-born workers to practice to the full scope of their licenses and special visas to fill certified nurse aide (CNA) positions.

**United, we are taking action together as one of the largest faith-based provider networks; we have the reach, we have the expertise and we have the responsibility.**

In peace,



Alesia Frerichs  
President & CEO

**In Case You Missed It**

- Read our full remarks to OMB [here](#).
- Heading to Washington, D.C. for the [LeadingAge Leadership Summit](#)? Join us for our breakfast on **Monday, April 15 at 7:15–8:30 a.m.** Please contact [Ashley Washington](#) for additional information.
- The Health and Housing Solutions Summit is May 7–8 in Washington, D.C. Click [here](#) for more information and to register.



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