

Small Business Economic Impact Statement (SBEIS)  
 For WAC 246-841-530 through WAC 246-841-585  
 Alternative Training for Home Care Aide-Certified and  
 Medical Assistant-Certified

**Section 1. What is the scope of the proposed rule package?**

Engrossed Substitute Senate Bill (ESSB) 6582 (2010) requires the Nursing Care Quality Assurance Commission (commission) to adopt rules establishing criteria for alternative training programs for existing home care aides-certified and medical assistants-certified to complete so they may be eligible to qualify to take the nursing assistant-certified competency evaluation. The proposed rules will give existing home care aides-certified and medical assistants-certified the option to take an alternative 24-hour training program to supplement their existing education rather than complete the standard nursing assistant training program, which is 121-hours of classroom and clinical training. Upon completion of the alternative training and competency evaluation, applicants are eligible to apply for a nursing assistant-certified (NAC) credential. Rules shall recognize and not duplicate relevant training and experience. Rules shall also provide for career advancement opportunities.

There are currently 42,664 NAC's in Washington State. Home care aide-certified is a new profession. The Department of Health (department) will begin regulating home care aides in 2011. The title "Medical Assistant-certified" is a working title for health care workers who have graduated from programs offering medical assistant degrees. Washington does not currently issue a credential to medical assistants. There are, however, some Washington schools offering medical assistant degrees. The department does not have a tally or count of the number of people that have graduated with a medical assistant degree.

**Section 2. Which businesses are impacted by the proposed rule package? What are their North American Industry Classification System (NAICS) codes? What are their minor cost thresholds?**

NAICS Code 4, 5 or 6 digit)	NAICS Business Description	# of businesses in WA	Minor Cost Threshold = 1% of Average Annual Payroll	Minor Cost Threshold = .3% of Average Annual Receipts
<b>611519</b>	<b>Other Technical and Trade Schools<sup>1</sup></b>	116	\$3,040	\$2,938
<b>611210</b>	<b>Community colleges/Junior Colleges</b>	Not available in NAICS	Not Available in NAICS	Not Available in NAICS

2007 NAICS Data

<sup>1</sup> This U.S. industry comprises establishments primarily engaged in offering job or career vocational or technical courses (except cosmetology and barber training, aviation and flight training, and apprenticeship training). The curriculums offered by these schools are highly structured and specialized and lead to job-specific certification.

### **Section 3. What is the estimated cost per business of the proposed rule?**

The commission conducted a survey to determine if any parties were considering creating an alternative training program and if so, to obtain estimated costs to create an alternative nursing assistant-certified training program for those recognized as home care aide-certified and medical assistant-certified. The commission sent a survey to 450 individuals on the DSHS list serv. This list serv is composed of individuals and schools affiliated with existing nursing assistant certified training programs. The survey asked participants to provide costs to develop the program, including salaries, materials, supplies, equipment and “other” costs. The total costs reported by seventeen of the nineteen respondents were \$5,000 or less. The other two respondents, however, reported substantially higher costs estimates (\$16,900 and \$29,700).

The commission recognizes that in addition to the costs for creating the alternative training program, facilities and schools that elect to offer such training will also incur ongoing costs associated with offering the program. For example, these entities will incur costs such as salary of the instructors, administration (application process, record keeping, etc.) and facilities (rent, equipment). This analysis does not attempt to quantify these costs, the assumption is these costs will drive tuition costs for the courses being offered.

### **Section 4. Does the rule impose more than minor costs on two or more impacted businesses?**

Yes. Several respondents provided cost estimates for creating an alternative training program that exceed the minor cost threshold for their industry.

### **Section 5. Does the rule have a disproportionate impact on small businesses?**

Yes. The North American Industry Classification System indicates that there are both small and large businesses in the impacted business classification. It appears that the required tasks and associated costs to develop an alternative training program would be comparable to both small and large businesses. Therefore, using the “cost per employee” methodology, the commission assumes that there will be a disproportionate impact on small businesses because they have fewer employees than large businesses.

### **Section 6. Did we make an effort to reduce the impact of the rule?**

The commission made an effort to reduce the impact of the rule in the following ways:

- The commission reviewed the proposed curriculum of home care aide-certified and the existing curriculum for medical assistant-certified to the curriculum for nursing assistant-certified. Only the gaps between the curriculums were included in the rules.

- The proposed rules reduce record keeping by requiring the same kinds of record keeping whether a school has an alternative training program or a standard nursing assistant training program.
- The rules allow the program to assess the student to determine what additional training they deem necessary. The rules outline the minimum standards but leave options for the schools. This allows the school to incorporate their existing nursing assistant training program requirements as much as possible. This also allows the school flexibility because each student has different skill sets. The skill sets can be assessed by the school and only the gaps in their training need to be addressed. This reduces the cost of a school in providing alternative training.

### **Section 7. Did we involve small businesses in the rule development process?**

Yes. Both of the stakeholder meetings involved representatives from schools, employers and existing nursing assistant training programs. The commission sent invitations to the nursing list serve which includes nurses, facilities, employers and nursing assistant training programs.

In addition, the commission sent a survey to all nursing assistant training programs asking for additional information. The survey asked questions about interest in developing an alternative program. The survey asked about the cost to develop a program, staffing levels needed and cost to students. A summary of the results from this survey are included in this document.

### **Section 8. Will businesses have to hire or fire any employees because of the requirements in the rule?**

The commission's analysis concludes that that there will not be any jobs lost as a result of the proposed rules. If a school or facility chooses to develop an alternative training program they may choose to employ additional staff or use their existing staff.