

**FISCAL NOTE  
PUBLIC COST**

- I. Department Title: Department of Health and Senior Services  
Division Title: Division of Regulation and Licensure  
Chapter Title: Training Program for Nursing Assistants**

<b>Rule Number and Name:</b>	19 CSR 30-84.010 Nursing Assistant Training Program
<b>Type of Rulemaking:</b>	Proposed Amendment

**II. SUMMARY OF FISCAL IMPACT**

Affected Agency or Political Subdivision	Estimated Cost of Compliance in the Aggregate
(14) Skilled Nursing Facilities (SNFs)	\$24,014
(56) Vocational technical, comprehensive high schools approved by Missouri Department of Secondary Education (DESE)	\$96,054
(33) Public agencies approved by Missouri Department of Higher Education (DHE)	\$56,603
(6) Hospitals	\$10,292
(7) Veteran's homes	\$12,007
<b>TOTAL COSTS =</b>	<b>\$198,970</b>

**III. WORKSHEET**

**Costs of Student Training Materials/Materials on public entities**

SNFs: (1 student manual @ \$51.68) x (10 students per class) x (14 LTC facilities) x 3 classes = \$21,705.60

Vocational technical schools, comprehensive high schools approved by DESE: (1 student manual @\$51.68) x (10 students per class) x (56 schools) x 3 classes = \$86,822.40

Agency/schools approved by the Missouri DHE: (1 student manual @\$51.68) x (10 students per class) x (33 agencies/schools) x 3 classes = \$51,163.20

Hospitals: (1 student manual @\$51.68) x (10 students per class) x (6 public owned hospitals) x 3 classes = \$9,302.40

Missouri Veterans Homes: (1 student manual @\$51.68) x (10 students per class) x (7 homes) x 3 classes= \$10,852.80

Total for costs of student manual/instructional materials for public entities: \$21,705.60 + \$86,822.40 + \$51,163.20 + \$9,302.40 + \$10,852.80 = \$179,846.40

**Costs of Instructor Training Materials/Manuals on public entities**

SNFs: (1 instructor manual @ \$54.95) x (3 instructors per facility) x (14 facilities) = \$2,307.90

Vocational technical schools, comprehensive high schools approved by DESE: (1 instructor manual @ \$54.95) x (3 instructors per facility) x (56 schools) = \$9,231.60

Agency/schools approved by the Missouri DHE: (1 instructor manual @ \$54.95) x (3 instructors per facility) x (33 schools) = \$5,440.05

Hospitals: (1 instructor manual @ \$54.95) x (3 instructors per facility) x (6 hospitals) = \$989.10

Missouri Veterans Homes: (1 instructor manual @ \$54.95) x (3 instructors per facility) x (7 homes) = \$1,153.95

Total for costs of instructor materials/manuals for public entities: \$2,307.90 + \$9,231.60 + \$5,440.05 + \$989.10 + \$1,153.95 = \$19,122.60

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TOTAL COSTS: \$179,846.40 (total for student manual/instructional materials) + \$19,122.60 (total for instructor materials/manuals) = \$198,969.00

**IV. ASSUMPTIONS**

**Costs of Student and Instructor Manual/Instructional Materials on public entities**

All approved training agencies are required to provide each student and instructor his or her own instruction training material(s) that encompasses the required curricula content found in 19 CSR 30-84.010. A training agency conducting the nursing assistant basic course must purchase material(s) that is published, includes all the curricula content for the basic course listed in 19 CSR 30-84.010, and is no more than ten (10) years old.

The public fiscal note is based on the assumption that all department approved nursing assistant training agencies will purchase the required training material(s) for each student and instructor.

There are currently 116 entities that are publicly owned training agencies approved by the department which include the following:

- 14 SNFs
- 56 DESE
- 33 DHE
- 6 Hospitals
- 7 Missouri Veterans Homes

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Total of 116 publicly owned training agencies

The formula for determining the costs an approved training agency would incur to purchase the required nursing assistant training materials for instructors and students would be at least one (1) textbook for each student and one (1) textbook for each instructor. The department estimated that each approved training agency would maintain an average number of instructors per class, conduct a certain number of training classes per year with an average number of students per class.

The department reviewed three (3) entities that publish a nursing assistant training textbook for students and instructors to determine an average costs for a training manual/material. Based on the information, the department estimated the average cost for a student nursing assistant training manual/materials to be: \$51.68 and the average cost for an instructor's nursing assistant training manual/materials to be: \$54.95

The department received input from several training agencies on the number of instructor's employed/contracted, number of students per class, and the number of classes held per year. Based on the information provided the estimated number of instructors per class is 3; average students per class is 10; and the number of classes held per year is 3.

The formula for determining the cost to a training agency to purchase the nursing assistant training material for each student is as follows: (Average cost of one (1) student textbook) x (number of students per class) x (number of publicly-owned training agency) x (number of classes).

The formula for determining the cost to a training agency to purchase the nursing assistant training material for each instructor is as follows: (Average cost of one (1) instructor textbook) x (number of instructors per training agency) x (number of privately-owned training agency). NOTE: Because some instructor textbooks and online teaching instruction are free with the purchase of student texts, this will help keep instructor costs more affordable. Also, the department assumes that the training agency keeps the instructor materials, regardless of who instructs the course and instructor materials are only purchased once during the year.

### **Costs of CNA final examination for individuals**

The department is not including costs for approved publicly-owned training agencies regarding the CNA final examination. Certified intermediate care facilities and skilled nursing facilities are reimbursed for costs to train nursing assistants through the Missouri Medicaid CNA reimbursement program, which includes the final examination. The department believes that approved publicly-owned training agencies can recoup costs through tuition fees. Hospitals and Veterans' homes are not required to pay for the CNA final examination; however, they may offer incentives or bonuses such as paying for a CNA final examination to retain them for employment. The fiscal impact would be a private cost for an individual who may have to pay for the CNA exam out of his/her own pocket.

### **Costs of CNA twenty-four (24) month renewal certification**

The department is not including the costs for publicly-owned training entities to ensure that a CNA that maintains their active status on the CNA registry because the CNA is solely responsible to pay the associated renewal fee of \$20.00. The regulation does not

require publicly-owned entities to pay the cost for CNA renewal certifications. The fiscal impact would be a private cost for a CNA.

### **Costs of Instructor Update Training**

The department is not including the costs for publicly-owned training agencies who employ/contract with instructors to ensure they complete the required four (4) hour instructor update training. An individual who wishes to be an approved instructor or retain their approved status will be solely responsible to pay the fee assessed for the four (4) hour Instructor Update Training and complete the course by August 31, 2022 and every five (5) years thereafter to retain an active status. The fiscal impact would be a private cost for an instructor.