



## MEMORANDUM

**FROM:** Richie Farran, V.P. of Government Services, Health Care Association of Michigan  
**DATE:** April 27, 2023  
**SUBJECT:** Fall Prevention Training Bill Drafts 02196'23 and 02132'23

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The Health Care Association of Michigan represents 359 skilled nursing facilities across the state, including for profit, non-profit, county medical care facilities, and hospital based long-term care units. HCAM and its members are committed to ensuring quality care for Michigan's senior population. The health, safety, and wellbeing are the top priority for Michigan providers. Historically, Michigan's nursing facilities exceed the national average in important indicators of quality as measured by the Centers for Medicare and Medicaid (CMS).

HCAM appreciates Representative Julie Rogers and Representative Helena Scott for their shared goal of enhancing resident safety. The fall prevention training bill draft package, however, is redundant and adds unnecessary time and cost burden on providers already facing historic workforce and financial challenges. The bills fail to achieve the goal of enhanced resident safety.

For these reasons, HCAM is opposed to the proposed bill package as currently written.

The bills are redundant in multiple ways. First, the staff who most often interacts with residents – nurses and certified nurse aides (CNA) – are educated and trained on fall prevention during their training for these positions, both through state-approved training programs as well as training conducted by facilities at which they are employed.

Second, the Department of Licensing and Regulatory Affairs (LARA) has repurposed ten surveyors to conduct consultative visits with every nursing facility in the state on fall prevention policies and procedures. The department is prioritizing facilities and makes recommendations for improvements based on the reviews.

Additionally, the bill adds unnecessary burdens – without achieving the bills' goals – on facility staff. The bill states that any unlicensed employee would be required to receive this training. This would include staff that has very little interaction with facility residents, including those in the billing office or cooks. The time and resources needed to ensure these employees completed the training required under the bill would result in little to no impact on residents.

HCAM welcomes alternative policy conversations aimed at ensuring quality care and well-trained staff, such as the establishment of a medication aide registry.

If you have any questions or concerns regarding HCAM's position on these bills, or would like to discuss policies impacting long-term care, you may contact me at 517-627-1561 or via email at [RichFarran@hcam.org](mailto:RichFarran@hcam.org).