

Date: March 26, 2019

To: Representative Rick Gundrum, Chair, Assembly Committee on Aging and Long-Term Care
Members, Assembly Committee on Aging and Long-Term Care

From: Disability Rights Wisconsin – Barbara Beckert, Director Milwaukee Office

Re: 2019 AB 76

Disability Rights Wisconsin is the protection and advocacy system for people with disabilities in Wisconsin. In that capacity, we work with people with disabilities who rely upon well-trained certified nurse aides (CNAs) to assist with personal cares and daily tasks of living, while also providing emotional support.

We oppose AB 76 because we are concerned that lowering training requirements for certified nurse aides will affect the quality of care for people with disabilities in long-term and residential care facilities. Studies have demonstrated that increased training reduces job turnover while increasing job satisfaction.¹ Over half of the states in the U.S. have elected to require training over the minimum 75 hours required by the federal government, and the Institute of Medicine recommends expanding federal training requirements to 120 hours.²

Reducing the number of training hours is also unlikely to alleviate the long-term care workforce shortage in Wisconsin. Contributions to the workforce shortage may include but are not limited to: low pay, lack of or limited benefits, long and/or difficult hours, residents with more complex physical and behavioral health needs, and diminished availability of family caregivers.³ These all place a strain on CNAs and may contribute to the workforce shortage.

We are encouraged by the establishment of a new Wisconsin Task Force on Caregiving. The Task Force on Caregiving is charged with analyzing strategies to attract and retain a strong direct care workforce, finding strategies to support families providing caregiving supports and services, and improving the quality of caregiving in Wisconsin. It is premature to move forward with such a significant change, reducing by nearly 40% Wisconsin CNA training requirements, prior to the convening of the Caregiver Task Force. At a minimum, we recommend that you delay consideration of this training hours change until after the Task Force issues its recommendations.

Thank you for considering our concerns regarding the reduction of required training hours. DRW remains committed to working with policy makers on solutions to Wisconsin’s long-term care workforce shortage.

¹ Han, K., Trinkoff, A.M., Storr, C.L., Lerner, N., Johantgen, M., Gartrell, K. (2014). Associations between state regulations, training length, perceived quality and job satisfaction among certified nursing assistants: Cross-sectional secondary data analysis. *International Journal of Nursing Studies*, 51 (8), 1135-1141.

² Paraprofessional Healthcare Institute (PHI) (2016). *Raise the Floor: Quality Nursing Home Care Depends on Quality Jobs*. <https://phinational.org/sites/default/files/research-report/phi-raisethefloor-201604012.pdf>

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