

Joe Lombardo
Governor



Richard Whitley,
MS
Director



Cody Phinney,
MPH
Administrator

Ihsan Azzam,
Ph.D., M.D.
Chief Medical Officer

SMALL BUSINESS IMPACT STATEMENT 2023

PROPOSED AMENDMENTS TO NAC 439

The Division of Public and Behavioral Health (DPBH) has determined that the proposed regulations may have a negative economic impact upon a small business. It is not anticipated that the proposed regulations would directly restrict the formation, operation or expansion of a small business.

A small business is defined in Nevada Revised Statutes NRS 233B as a "business conducted for profit which employs fewer than 150 full-time or part-time employees."

This small business impact statement is made pursuant to NRS 233B.0608 (3) and complies with the requirements of NRS 233B.0609. As required by NRS 233B.0608(3), this statement identifies the methods used by the agency in determining the impact of the proposed regulation on a small business in sections 1, 2, 3, and 4 below and provides the reasons for the conclusions of the agency in section 8 below followed by the certification of the person responsible for the agency.

BACKGROUND

Health care facilities listed in NRS 449.119, or an intermediary service organization set forth in NRS 449.4304 that are statutorily required to conduct background checks currently pay the costs associated with having their fingerprints rolled and pay a fee to the Department of Public Safety. The current fingerprint fee structure charged by the Department of Public Safety is \$40.25. This includes a \$13.25 FBI fee and a state fee of \$27 for a total cost of \$40.25. This does not include the cost of obtaining the actual fingerprints. This cost varies depending on where an individual is fingerprinted. NRS 449.123 allows a facility, hospital, agency, program, or home to recover from the employee or independent contractor whose fingerprints are submitted to the Department of Public Safety not more than one-half of the fee imposed by the Department of Public Safety's Central Repository.

The fee charged by the Department of Public Safety, and the fee to obtain the actual fingerprints, do not include the cost to analyze the criminal history, make a determination of employment eligibility, and enter the employment eligibility results into the Nevada Automated Background Check system. It also does not include the cost to support the website. Historically, the Division has absorbed these costs. The Division is no longer able to incur this expense and is now in a position where these costs must be recovered, as authorized in NRS 439.948.

- 1) A description of the manner in which comment was solicited from affected small businesses, a summary of their response and an explanation of the manner in which other interested persons may obtain a copy of the summary.

Pursuant to NRS 233B.0608 (2)(a), the Division of Public and Behavioral Health has requested input from actively licensed facilities, hospitals, agencies, programs or homes listed in NRS 449.119 and from

intermediary service organization, as set forth in NRS 449.4304, that may be economically impacted by the proposed regulations.

An email with a link to the Small Business Impact Questionnaire and proposed regulations were sent to actively licensed facilities, hospitals, agencies, programs or homes listed in NRS 449.119 and to intermediary service organizations as set forth in NRS 449.4304 on July 6, 2023. The questions on the questionnaire were:

- 1) How many employees are currently employed by your business?
- 2) Will a specific regulation have an adverse economic effect upon your business?
- 3) Will the regulation(s) have any beneficial effect upon your business?
- 4) Do you anticipate any indirect adverse effects upon your business?
- 5) Do you anticipate any indirect beneficial effects upon your business?

SUMMARY OF RESPONSE

Summary Of Comments Received Fifty-two (52) responses were received from small businesses.*			
Will a specific regulation have an adverse economic effect upon your business? Yes – 39 No – 13	Will the regulation (s) have any beneficial effect upon your business? Yes – 6 No – 46	Do you anticipate any indirect adverse effects upon your business? Yes – 31 No – 20	Do you anticipate any indirect beneficial effects upon your business? Yes – 11 No – 41
Comment Summary: -High yearly cost. -Additional reimbursement to employees would be expensive and unfair. -High recruitment/turnover rate would raise costs. -New fee would be incurred by every new and current employee when up for renewal. -No adverse impact. -Employees go through the hiring/background process but never come back. -Additional fee on top of other expenses such as unemployment, worker's compensation liability insurance, state-mandated trainings, physicals, and TB tests. -Significant cost for conducting business with contractors.	Comment Summary: -No benefits. -Saving a lot of money if fee is only \$14. -Business can shoulder fee expenses for permanent employees but not contractors. -Will save time and money if fee results in faster background check results.	Comment Summary: -Will have to cut costs in other areas to make up for the new fee. -Slower hiring and longer delays in hiring. -Higher hiring costs. -Decrease number of candidates, resulting in limited staff. -Additional expenses on contractors. -Raise hourly rate for the end consumer. -Close business. -More work in obtaining additional documentations. -Higher expenses without raise in Medicaid reimbursement rate.	Comment Summary: -No indirect benefits. -Any reduction in cost will help small businesses. -Make sure that contractors are properly checked even if they are not considered permanent employees of the agency. -

<p>-Rates for private pay consumers will be increased.</p> <p>-Fee increase without reimbursement increase.</p> <p>-\$14 is okay now unless fee is raised at a rapid rate.</p> <p>-It would be beneficial to not keep running fingerprints to each applicant if they have already been fingerprinted under the facility's employment.</p> <p>-Fee would result in lower pay offers to employees.</p> <p>-Total expense to hire a new caregiver would be \$875-900 to comply with requirements.</p>			
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*This is a summary of the responses received from small businesses. Please refer to Attachment A for all comments received from the 52 responses.

Responses were received from three (3) businesses that did not meet the definition of a small business and are not included in this summary.

2) Describe the manner in which the analysis was conducted.

A health program manager and management analyst assessed the current expenses to the Division and determined a per-application fee of no greater than \$14 would cover the Division's current operating expenses outlined in the background check section that are not currently covered by existing background check related fees.

3) The estimated economic effect of the proposed regulation on the small business which it is to regulate including, without limitation both adverse and beneficial effects and both direct and indirect effects.

Adverse Economic Effects – The proposed regulations would increase expenses for small businesses, and per comments received in the Small Business Impact Questionnaire, may have a negative financial impact on a small business.

Indirect Adverse Economic Effects – Per comments received in the Small Business Impact Questionnaire, the proposed regulations may result in additional costs being incurred by employees or consumers, reduction of spending in other areas to accommodate a new fee, a decrease in candidates hired resulting in fewer staff for client care, or close of business.

Beneficial Economic Effects – As the Division has been absorbing these costs and will now be accessing a new fee, it is anticipated that there will be no beneficial economic effects on a small business.

Indirect Beneficial Economic Effects – There are no immediate indirect beneficial economic effects to small businesses. The proposed regulations will be modified to allow a facility to recuperate the application fee from applicants. Assessing a fee to applicants for employment for this portion of the

background check, may result in individuals that are not serious about accepting a position from applying. It would also help offset this cost to small businesses.

- 4) Provide a description of the methods that the agency considered to reduce the impact of the proposed regulation on small businesses and a statement regarding whether the agency actually used any of those methods.

In considering possibilities to recover costs to the Division for conducting the determinations for background checks, staff considered a flat fee to a licensed facility, hospital, agency, program or home listed in NRS 449.119 or an intermediary service organization as set forth in NRS 449.4304 or a per-application fee to such businesses. It is anticipated that a per-application fee would reduce the impact of the proposed regulation on small businesses, as costs would be proportionate to the amount of staff of the business.

In addition, the Division will be modifying the proposed regulations to allow employers to recover the cost of the per-application fee of no greater than \$14 from each applicant. This will help to offset the direct costs to small businesses. In addition, it was noted in the responses to the small business impact questionnaire that certain applicants apply for a position but are not hired. Assessing a fee to applicants for employment for this portion of the background check, may result in dissuading individuals that are not serious about accepting a position from applying. This would also help offset this cost to small businesses.

Additionally, the Division would take into account the recuperation of these operating costs from the implementation of the proposed regulations when considering any analysis of licensing fees, lessening any future potential fee adjustments. The flexibility of being able to recover the new fee from an applicant, at a minimum, provides a small business the opportunity to offset these costs whereas the same opportunity may not present itself if these operating costs became part of any future potential fee adjustments.

- 5) The estimated cost to the agency for enforcement of the proposed regulation.

There are no anticipated costs to the agency for enforcement of the proposed regulations.

- 6) If the proposed regulation provides a new fee or increases an existing fee, the total annual amount DPBH expects to collect and the manner in which the money will be used.

The Division expects to collect sufficient funds to offset the current operating cost to conduct an investigation into the background and personal history of a person pursuant to NRS 439.942 to 439.948.

- 7) An explanation of why any duplicative or more stringent provisions than federal, state or local standards regulating the same activity are necessary.

There are no known duplicate or more stringent provisions regulating to the same activity.

- 8) Provide a summary of the reasons for the conclusions of the agency regarding the impact of a regulation on small businesses.

The Division concluded the proposed regulations may have a negative economic impact upon a small business. With the modification to the proposed regulations allowing a small business to recover the not more than \$14 application fee from an applicant, and having the amount that may be recovered to be no more than \$14 per applicant, it is anticipated that the proposed regulations would not directly restrict the formation, operation or expansion of a small business. The reason for the conclusion is based on industry feedback which indicated there would be an adverse economic impact on businesses and the modification to the proposed regulations to help reduce the impact on small businesses. The Division anticipates the proposed regulations, with the modification to allow the facility to recover costs of the fee

from the applicant being background checked, would mitigate such impact compared to alternative possible solutions.

Any other persons interested in obtaining a copy of the summary may e-mail, call, or mail in a request to Kayla Samuels at the Division of Public and Behavioral Health at:

Division of Public and Behavioral Health
727 Fairview Drive, Suite E
Carson City, NV 89701
Kayla Samuels
Phone: (775) 484-4009
Email: k.samuels@health.nv.gov

CERTIFICATION BY PERSON RESPONSIBLE FOR THE AGENCY

I, Cody Phinney, Administrator of the Division of Public and Behavioral Health certify to the best of my knowledge or belief, a concerted effort was made to determine the impact of the proposed regulation on small businesses and the information contained in this statement was prepared properly and is accurate.

Signature Cody h Phinney

Date: 9/07/2023

Joe Lombardo
Governor

Richard Whitley,
MS
Director



**DEPARTMENT OF
HEALTH AND HUMAN SERVICES**
**NEVADA DIVISION of PUBLIC
and BEHAVIORAL HEALTH**



Cody Phinney,
MPH
Administrator

Ihsan Azzam,
Ph.D., M.D.
Chief Medical
Officer

SMALL BUSINESS IMPACT STATEMENT 2023

ATTACHMENT A

This attachment contains all of the comments received from the 52 responses received from small businesses.

SUMMARY OF RESPONSE

Summary Of Comments Received Fifty-two (52) responses were received from small businesses.			
Will a specific regulation have an adverse economic effect upon your business? Yes – 39 No – 13	Will the regulation (s) have any beneficial effect upon your business? Yes – 6 No – 46	Do you anticipate any indirect adverse effects upon your business? Yes – 31 No – 20	Do you anticipate any indirect beneficial effects upon your business? Yes – 11 No – 41
<p>Comments:</p> <ul style="list-style-type: none"> -The estimated yearly cost \$700.00 -Given that staffing is already difficult and there has been a significant amount of turnover, this added cost will have adverse effects as we already reimburse employees the \$70 or so dollars for their fingerprints. So adding on more fees on top of that would be unfair. -NRS 439.942 to 439.948, due to the continuing recruiting of personnel and higher wages this additional fee will cost the community an additional \$1,700. ----We recruit an average of 10 employees per month. -We were already hit severely by being required to pay for COVID fit testing. These range from \$75 - \$375 per test. We spent around \$20,000 	<p>Comments:</p> <ul style="list-style-type: none"> - There are no benefits to charging small business more fees. It will just add to our operating costs which then affects our bottom line. - Only negative financial impact, no additional positive gain to this fee. - Saving a lot of money if fee is only 14.00 - We believe the business can 	<p>Comments:</p> <ul style="list-style-type: none"> - We have to cut costs in other areas to make up for the new fees if added. - Slower hiring process, longer delays in hiring, bleeding OT in an already bled staff crisis post covid. - we have limited financial costs but this will be very high human costs in terms of loss - Higher financial costs for hiring new employees 	<p>Comments:</p> <ul style="list-style-type: none"> - No benefits, only increased financial burdon on small businesses that are already incurring higher/inflated hiring costs for new associates - Any reduction of cost will only help survive our small business (20 employees) - The indirect beneficial benefit of our Home Health Agency is that we are sure that those Contrators that we

<p>getting the organization tested during the pandemic. This new fee is ridiculous as this will be incurred by every new hire as well as every current hire when they are up for renewal.</p> <p>-It will not have an adverse impact on my business. It will cost approximately \$1,400 per year with the standard residential treatment center staff turnover rate.</p> <p>-we are a non profit company and we encounter many potential employees who complete our employment process and even before we receive the prints and background back these potential employees never come back and we end up paying for the prints and now on top of this is additionally 14.00 on top of the 20, its becoming discouraging</p> <p>- THE IMPOSED REGULATION TO RAISE THE BACKGROUND RATE WILL COST MY BUSINESS AN ADDITIONAL \$9000 PER YEAR. THE ADVERSE IMPACT THIS WILL HAVE ON MY BUSINESS IS BECAUSE I AM PAYING FEES WITH THE STATE THAT HAVE RAISING COST AS WELL AS UNEMPLOYMENT, WORKERS COMP, & LIABILITY INSURANCE, & OTHER TRAININGS THAT ARE MAINDATED BY THE STATE, THE EMPLOYEE IS RESPONSIBLE FOR PAYING. WE ALSO HAVE TO COVER THE COST FOR PHYSICALS & TB TEST FOR EVERY NEW HIRE. WE HAVE NOT RECEIVED A RAISE FROM THE STATE OF NEVADA FOR REIMBURSEMENT OF SERVICES PROVIDED.</p> <p>- The cost would impact my business by approximately \$140.00 annually. With high turnover rate, I am already economically impacted, as I cover the \$88.00 charge/employee for fingerprinting.</p> <p>- New Fees for Background Checks- On average, we interview approximately 6-7 potential candidates weekly, pending background. If there are 7 weekly candidates checked at \$14 each, that will cost us \$392 which will</p>	<p>shoulder background check expenses for permanent employees and NOT for contractors when we run background checks on them.</p> <p>- rthis is a stupid question</p> <p>- We already have background check for all our new and current employees. additional fees overtime will also affect our budget. Example: with 3 resident paying \$2,000/month. Total of \$6,000/ month. our rent: \$ 2,000/month, food \$ 2,000/month, 1 employee \$2,000/ month, Liability Insurance , and other expenses. Now do the math. We are always under budget.</p> <p>- Depending on what the information is that is being gathered it could cut down the time that it takes HR to track down references. If the information is helpful in deciding on a candidate before they start it will save us time and money put into the training of someone that has a negative background report. I have</p>	<p>- The indirect adverse effects towards the business will cause us to decrease amount of candidates needed for clients; the income for staff will need to decrease when it's already a strain to keep staff at hourly presently and this will leave many clients without care if we have limited staff to assist.</p> <p>- We will incur additional expenses on Contractors that are not considered permanent of the Agency.</p> <p>- I will again raise my hourly rate for the end consumer to cover this cost. Home care is a different animal than a bed facility. We do not have endless customers and our costs are not reimbursed by medicare. This will result in rates being increased for private consumers causing consumers to either move people into a place where they won't have to foot the bill. You continue to price non-medical home care out of business. Why are you doing this?</p> <p>- we have to pay for this, we do NOT get any increases (medicaid no increawe since 2012, same with clark</p>	<p>do business with are properly checked even if they are not considered permanent employees of the Agency.</p> <p>- you are simply a part of killing the small business in town!</p> <p>initially it gave the impression you would lower the cost, misleading email info as well</p> <p>- There is nothing beneficial about this! It is a horrible idea!</p> <p>- We will be able to open our business and help our seniors who have lower income.</p> <p>- THE SALARY OF THE CAREGIVERS HAVE INCREASED ALMOST 40% WHILE THE MEDICAID WAIVER CLAIMS FOR THE OUR RECIPIENTS HAVE NEVER BEEN INCREASED SINCE 2014.</p> <p>Then here comes another FEE for DPBH for another background check for a new hired caregiver ADDING up to our operational expenses.</p> <p>- The SALARY of the Caregivers have been INCREASED ALMOST 40% while the MEDICAID WAIVER CLAIMS for the RECIPIENTS HAVE NEVER BEEN</p>
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<p>negatively impact our small business financially.</p> <ul style="list-style-type: none"> - We finally get the bill pass to get raise now you want to take it away by charging for fingerprints on top of they have to pay for fringed at a finger print place. - If you lower the cost for small business it will only help to survive - We have only seven(07) permanent employees under our employ, the new regulations will greatly impact the profitability of our small business. We usually conduct business with healthcare licensed professional contractors who have their own business licences and we also run background checks on them which are not considered permanent employees of ours. - More costs being pushed to the employer and if the employer is only private pay, they rates for the consumers will be increased again. Each time a new fee is charged to the employer for a caregiver cost, then the employer has to make up the margin shortfall somewhere else. There seems to be a myth that employers make a lot of money doing home care. For large hospitals and ALF's, this won't represent a big cost but for a little home care agency, this is another cost to them with little to no return on the investment. If charged to employers, with a current industry average caregiver turnover of 65%, assuming I hire 100 people a year, this is a charge of \$1,400 annually of which \$910 will be a complete waste of a cost due to turnover. If the fee is to be no more than \$14, an aspiring applicant can afford this fee and if they want to work in this industry and not just be a free-rider, then they should be responsible for paying this fee. - what ever regulation you refer to, any increase in cost for small business is killing the business! we dont get any increases from any government contract and yet everybody is increasing. how can we get pca s working for us now? 	<p>more questions to answer this with a true yes.</p> <ul style="list-style-type: none"> - MORE EXPENSES ON THE PART OF THE PROVIDERS - MORE EXPENSES IN THE PART OF THE PROVIDER AND A DUPLICATION TO THE NRS 449.123 - MORE EXPENSE IN THE PART OF THE PROVIDER - If this Regulation will be passed, this amount is an additional burden on the part of the providers. Providers are already suffering on the 25% increased of the Gross Price Index. - No savings, even add to the cost with no benefits - more expenses - No beneficial effect because it will add to our expenses - No benefit when it can increase expenses - No benefit when there's increase in expenses - There will be no beneficial effect when there's increase in expenses - more expense - If this regulation will be passed, this amount is additional burden on the part of the providers. Providers are already suffering 	<p>county home maker)</p> <ul style="list-style-type: none"> - Indirectly we may have to change our hiring practices to limit the amount of people we have to run. This will for sure have negative effects on the business. - we would probably close our doors because we cant afford to run a business while having so many fees for running a business is so high we cant stay above water due to the reimbursement received. - eventually closing our door for not making enough money. - MORE WORK IN THE PART OF THE PROVIDER IN DOING ALL THOSE DOCUMENTATIONS - MORE WORK IN OBTAINING ALL THOSE DOCUMENTATIONS - MORE WORK IN OBTAINING ALL THOSE DOCUMENTATIONS - Providers anticipate indirect adverse effect upon our business because most of our clients are Medicaid Recipients and there was no increase on the services rates payments to providers for almost 10 years. 	<p>INCREASED SINCE 2014. And now here comes another FEE for DPBH for another BACKGROUND CHECK for a new hired caregiver ADDING to our operational expenses.</p> <ul style="list-style-type: none"> - The SALARY of the caregivers have INCREASED ALMOST 40%, While the MEDICAID WAIVER CLAIMS for our RECIPIENTS HAVE NEVER BEEN INCREASED SINCE 2014. And now here comes another FEE for DPBH for another BACKGROUND CHECK for a new hired caregiver ADDING to our operational expenses. - The SALARY of caregivers have INCREASED ALMOST 40%, while the Medicaid Waiver Claims for our Recipients have never been INCREASED SINCE 2014. Then here comes another FEE that the DPBH is asking a \$14.00 for Background Investigation for a new caregiver adding to our operational expenses. - No benefit when there's increase in expense - more expenses
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<p>- Fees charged fro Background check. As long as fee stays within in a reasonable amount there should not be an issue. \$14.00 is OK now. But, if raises at a rapid ate then yes it would affect our business adversely.</p> <p>- the added per check fee will hurt us a lot, Las Vegas is the most transient place in the country, even with our employee retention rates better than average we loose people constantly and are running new ones all the time. These fees will just hurt us more as we are trying to still recover from the pandemic and in the middle of a recession this is ridiculous. Maybe make them free or very discounted on a sliding scale based on employees or revenue.</p> <p>- NRS 439.942 to 439.948; the cost of fingerprints and background check at the moment already runs at about \$60 per applicant. Our small agency gets about 15-20 applicants a year. However, it would be beneficial to not keep running fingerprints to each applicant if they already been currently fingerprinted. Sometimes, it still makes us run the fingerprint even if an applicant already had one done within 6 months. Would this apply to this regulation as well?</p> <p>- Regulations Authorizing a New Fee related to Background Checks is so unnecessary. We already pay a fee to the Repository of 65.00 for the background check. If the fee of 65.00 is not for the persons background then why are we paying that to them if the Division is the one doing the background investigation. Sounds like just another way for the State of Nevada to double dip into a pot thats empty anyways. This would cost our Agency, roughly about 200.00 a year in cost because thats about the average employees that are sent for the background. The States reimbursement is already not enough to employ the workers with a decent rate of pay and this would</p>	<p>on the 25% increase of the Gross Price Index. The salaries of caregivers have increased almost 40% now a days but Medicaid rates of the recipients we served have never been increased since 2014. Here is another proposed additional fee for background check by DBPH that adds up to our operational expenses.</p> <p>- If this regulation will be passed, this \$14.00 amount will be an additional burden on the part of the provider. Providers are already suffering from the 25% increased of the Gross Price Index.</p> <p>- \$14.00 seems to be a small amount , but if I add this up to the many fees and regulations and trainings that I have to come up with my small business, it does make a big impact on my financial responsibility to my already struggling small business.</p> <p>- This are additional expenses on the part of the provider.</p> <p>- There will be no cost savings</p>	<p>For the last three years, the numbers of the Medicaid Recipients became triple and we have to take care of our Elder Nevadans.</p> <p>- Increase in expenses</p> <p>- more Expenses</p> <p>- Increase in expenses is not beneficial to our business</p> <p>- Increase expenses</p> <p>- Increase in expenses will not benefit the business</p> <p>- Additional cost in new hires</p> <p>- more expense and repetition of background check</p> <p>- more exoense</p> <p>- Providers anticipate indirect adverse effects upon our business because most of our clients are medicaid recipients and there was no increase on the service rates payments to providers for almost 10 years. For the last three years, the numbers of the medicaid recipients became triple.</p> <p>- Providers anticipate indirect adverse effects upon our business because most of our clients are Medicaid recipients and there was no increase on the service rate payments to providers for almost 10 years. For the last three years, the</p>	<p>- Increase in expenses</p> <p>- No benefit when there's increase in expenses</p> <p>- Increase in expenses</p> <p>- Additional expense is not good for the business</p> <p>- more expense and repetition</p> <p>- more expenses and repetition of background check</p> <p>- Although the \$14 per staff is a small amount but when you get the total picture of the facility expenses, there is no beneficial effects on our care home business. We object this proposed regulation.</p> <p>- That the SALARY of caregivers have increased almost 40%, while the Medicaid Waiver Claims for the Recipients have never been INCREASED SINCE 2014. Then here comes another Fee of \$14.00 by DPBH for another Background Investigation for a new caregiver adding up to our operation expenses.</p> <p>- This will affect their Salary, and bonuses.</p> <p>- no beneficial effects, in fact it is more cost to the business. although the \$14.00 per staff is a small amount but when you get</p>
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<p>just lower what we already is having a hard time trying to offer.</p> <ul style="list-style-type: none"> - Add more cost to an already burdensome list of cost requirements to employee in our field - Increasing the fee of not more than \$14 per application to conduct an investigation into the background and personal history of a person pursuant to NRS 439.942 to 439.948 will greatly affect the the financial stability of Residential facility for groups because we are already receiving minimum payment from lower income resident and we are striving hard just to survive with the inflation as well the cost of food, rent and employees salary . Adding more fees for Residential Facility for Groups gives more burden on our financial status. - I like the proposal and what the money would be for, but what would be the turn around time to check into the history of the applicant? If we have to wait 30 to 45 days for an answer it is not worth the wait. I would also want to know what information would be gathered exactly? - <p>EVERLASTING SENIOR CARE HAVE 3 Caregivers including the Owner and the Administrator. Each new Caregiver hired, we spend \$875.00 per caregiver. Such as follows:</p> <ol style="list-style-type: none"> 1. NAC 449.0302 16 hours Medication Training, - - - - \$290.00, 2. NRS 449.123 Background check/Fingerprinting, - - \$80.00, 3. NAC 449.200 Physical Examination,- - - - - \$180.00, 4. NAC 449.200 TB Test or Quantiferon Plus Gold, - - - \$150.00, 5. NAC 449.200 CPR / First Aid, - - - - - \$75.00, 6. NAC 449.103 Cultural Competency Training, - - - - - \$100.00 <p>Total initial expenses for a new hire Caregiver - - \$875.00 PLUS another Background Check by DPBH - - \$14.00</p>	<p>instead it will be additional expenses. If this regulation will be passed, this amount is additional burden on the part of the providers. Providers are already suffering on the 25% increase of the Gross Price Index.</p>	<p>number of the Medicaid recipients became TRIPLE as one of the reasons of sometimes not accepting level one clients.</p> <ul style="list-style-type: none"> - \$14.00 seems to be a small amount , but if I add this up to the many fees and regulations and trainings that I have to come up with my small business, it does make a big impact on my financial responsibility to my already struggling small business. - extra costs. gross price index increased by20% for the last three years that affects the income ofbthe business. in addition, the salary of the caregivers increased by 40% because of the shortage of manpower. - Providers anticipate indirect adverse effects upon our business because most of our clients are medicaid recipients and there was no increase on the service rates payments to providers for almost 10 years. For the last three years, the numbers of the medicaid recipients became triple. <p>Although the \$14 per staff is a small amount but when</p>	<p>the total picture of the facility expenses, there is no beneficial effect on our care home business. We object this proposed regulation</p> <ul style="list-style-type: none"> - Since this proposed regulation is an additional expenses, there is no indirect beneficial affects on the part of the providers.
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GRAND TOTAL EXPENSES FOR NEW HIRE CAREGIVER \$889.00
 - GOLDEN VALLEY GROUP CARE I -
 Have 4 caregivers including the Owner and the Administrator. Every time we hire a new caregiver we are spending \$875.00 Such as follows:
 1. NAC 449.0302 Initial Medication Training - - - - - \$290.00
 2. NRS 449.123 Background check / Fingerprinting - \$80.00
 3. NAC 449.200 Physical Examination - - - - - \$180.00
 4. NAC 449.200 TB TEST / Quantiferon Plus Gold - - \$150.00 Plus X-ray if Positive \$?
 5. NAC 449.200 CPR / First Aid Training - - - - - \$75.00
 6. NAC 449.103. Cultural Competency Training - - - - \$100.00

Total initial expenses for a new hire caregiver. - - - - - \$875.00

Plus another background check by DPBH - - - - - \$14.00

GRAND TOTAL EXPENSES TO HIRE A NEW CAREGIVER - - - - \$889.00

- GOLDEN VALLEY GROUP CARE II -
 Have 4 caregivers including the Owner and the Administrator. Every time we hire a new caregiver we are spending \$875.00. Such as follows:

1. NAC 449.0302 Initial Medication Training - - - - - \$290.00
 2. NRS 449.123 Background Check / Fingerprinting - - - - \$80.00
 3. NAC 449.200. Physical Examination. - - - - - \$180.00
 4. NAC 449.200 TB Test / Quantiferon Plus Gold - - - - - \$150.00 plus X-ray if positive
 5. NAC 449.200. CPR / First Aid Training - - - - - \$75.00
 6. NAC 449.103. Cultural Competency Training - - - - - \$100.00

Total initial expenses to hire a new caregiver - - - - - \$875.00

you get the total picture of the facility expenses, there is no beneficial effects on our care home business. We object this proposed regulation.

Plus another Background check
 by DPBH -----
 \$14.00

GRAND TOTAL EXPENSES TO
 HIRE A NEW CAREGIVER -----
 -\$889.00

- EVERLASTING SENIOR CARE have 3
 caregivers including the Owner and
 the Administrator. Every time we
 hire a new caregiver we are
 spending \$875.00 per caregiver to
 comply with all the documentations
 for employment. The following
 documents are as follows:

1. NAC 449.0302 16 Hours
 Medication Training -----
 \$290.00
2. NRS 449.123 Background Check
 / Fingerprinting ----- 80.00
3. NAC 449.200 Physical
 Examination -----
 \$180.00
4. NAC 449.200 TB Test /
 Quantiferon Plus Gold -----
 \$150.00 Plus X-ray if positive \$?
5. NAC 449.200 CPR / First Aid
 Training ----- \$75.00
6. NAC 449.103 Cultural
 Competency Training -----
 \$100.00

TOTAL INITIAL EXPENSES for a
 new hired caregiver -----
 - \$875.00

PLUS another Background
 investigation by DPBH -----
 --- \$14.00

GRAND TOTAL EXPENSES to
 hire new caregiver -----
 - - \$889.00

- NRS 439.942
 14x5, around \$70 or more annually
 on top of all other expenses, ex,
 trainings, medical requirements,
 etc.. will definitely increase our cost
 especially with new employee hire.

- With more than \$1000 employee
 training and certification for newly
 hired this is another expenses for
 new employee this will be
 another.expenses for us. the regular
 background upon hite should be
 enough.

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- More expenses
- more expenses and and another backround check
- Home care providers are already spending around \$900 every time there is a new hire caregiver / staff.

We are already aware that the hiring of manpower is a biggest challenges to all businesses at present. The NRS 449.123/ NRS 449.174 (Background check) already costs around \$80 for a newly hired employee then additional \$14 is a big amount to our souring income. If a facility needs to comply to this regulation (if it will be passed) and granting that there are 10 newly hired staff / renewal in a year, there will be additional \$140 additional expenses to the provider.

- NRS 449.123 Approximately \$840 annually plus reimbursements for prints paid for upfront. This figure was calculated by finding an average of the number of applications submitted by this company over the past 8 years.
- GOLDEN VALLEY GROUP CARE I & II have 3 caregivers in each facility including my self the Owner and also the Administrator. Every time I hire a caregiver I am spending \$875.00 per caregiver in order to comply with the required documentations such as follows:

1. NAC 449.0302 16 hours initial Medication Training -----
\$290.00

2. NRS 449.123 Background check / Fingerprinting -----
 \$80.00

3. NAC 449.200 Physical Examination -----
 -- \$180.00

4. NAC 449.200 TB Test / Quantiferon Plus Gold -----
 - \$150.00 +X-ray if positive \$?

5. NAC 449.200 CPR / First Aid Training -----
 \$75.00

6. NAC 449.103 Cultural Competency Training -----
 --- \$100.00

TOTAL INITIAL EXPENSES for a new caregiver -----
 ----- \$875.00

Plus another Background Investigation FEE by DPBH -----
 ----- \$14.00

GRAND TOTAL EXPENSES TO HIRE A NEW CAREGIVER -----
 ----- \$889.00

- \$14.00 seems to be a small amount , but if I add this up to the many fees and regulations and trainings that I have to come up with my small business, it does make a big impact on my financial responsibility to my already struggling small business.

- There are enough charges being charged by the State I think enough is enough. charges on:
 Resident per bed, licensing, deficiencies, changing survey grades from A,B,C,D, cultural competencies, etc...

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<p>The salaries of caregivers have increased almost 40% now a days but Medicaid rates of the recipients we served have never been increased since 2014. Here is another proposed additional fee for background check by DBPH that adds up to our operational expenses.</p>			
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