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Jon Pennell, DVM, Chairperson
Nevada State Board of Health
4150 Technology Way, Suite 210
Carson City, NV 89706

Dear Chair Pennell,

On behalf of Dignity Health St. Rose Dominican and our seven acute care hospitals in Southern Nevada, thank you for the opportunity to submit additional comments regarding the Division's proposed revisions to regulations for cultural competency training (R004-24RP1).

As you may be aware, St. Rose currently operates a self-developed training program, which has been approved based on its comprehensive coverage of all required elements within a 90-minute timeframe. This program has been meticulously designed to meet the needs of our employees while ensuring compliance with all necessary standards for cultural competency education. However, R004-24RP1, as currently drafted, would require St. Rose to undergo the development and implementation of an additional training program for newly hired employees because of the 2-hour requirement in Section 11 of the regulation... While we acknowledge the importance of thorough training for all staff members, we believe that our currently approved 90-minute program encompasses all essential content, and should not be deemed insufficient simply because it is delivered in less than 2-hours.

It is crucial to note that St. Rose already provides our approved 90-minute course to all employees, underscoring our commitment to ensuring a knowledgeable, capable, and culturally competent workforce. Implementing additional training time to meet the 2-hour threshold would not create a significant financial burden on the system, but also introduce unnecessary administrative complexities leading to even more financial burden. At St. Rose, we take pride in our mission to treat all individuals with dignity and respect. Our existing training program reflects this ethos by empowering our employees with the necessary skills and knowledge to excel in their roles in accordance with that mission.

Therefore, we are proposing the following amendment that will enable us to maintain the integrity of our training program, while ensuring the system is not strained by additional financial and administrative burden.

St. Rose Proposed Change to Section 11 of R004-24RP1

Explanation of Mockup Language: (1) *blue bold italics* is existing language in the draft regulations; (2) green bold underlining is language proposed to be added to the draft regulations; and (3) ~~red strikethrough~~ is language in the draft regulations which is proposed to be deleted. (4) ~~Bracketed purple double strikethrough text~~ text is new language originally proposed to be added by the RP1 draft, which is proposed to be added by this request.

Sec. 11. Section 14 of LCB File No. R016-20 is hereby amended to read as follows:

1. ~~Pursuant to subsection 1 of~~ *Except as otherwise provided in* NRS 449.103,
~~within 30~~

~~business days after the course or program is assigned a course number by the Division pursuant~~

~~to section 18 of LCB File No. R016-20 or within 30 business~~ *as amended by section 1 of Assembly Bill No. 267, chapter 202, Statutes of Nevada 2023, at page 1176, a facility shall provide* ~~at least 2 hours of~~ *cultural competency training through an approved course or program to an agent or employee described in subsection 2 of NRS 449.103, as amended by section 1 of Assembly Bill No. 267, chapter 202, Statutes of Nevada 2023, at page 1176:*

- (a) *Within 90 days* ~~of any~~ *after contracting with or hiring the agent or employee* ; ~~being contracted or hired, whichever is later,~~ and ~~at~~

- (b) *At least 2 hours* ~~once each year~~ *biennially* thereafter . ~~a facility shall conduct training relating specifically to cultural competency for any agent or employee of the facility who provides care to a patient or resident of the facility so that the agent or employee may:~~

~~(a) More effectively treat patients or care for residents, as applicable; and~~

~~(b) Better understand patients or residents who have different cultural backgrounds, including, without limitation, patients or residents who fall within one or more of the categories in paragraphs (a) to (f), inclusive, of subsection 1 of NRS 449.103.]~~

— End of Proposed Change —

- This change would ensure that the ongoing standard of requiring at least 2-hours of approved cultural competency training administered biennially remains intact, but prevent St. Rose and other entities who may be similarly situated from incurring additional financial and administrative cost when providing the training to new employees by simply stating they must receive the training from an approved course within 90-days of being hired.

We appreciate the Board's consideration of our proposed changes, and look forward to continuing to work with the Board.

Please direct any questions you may have to Dignity Health's Director of Nevada Government Relations, Allison Genco at Allison.Genco@DignityHealth.org.

Respectfully submitted,



Katherine Vergos
Nevada Market President
President/CEO St. Rose Siena Hospital

cc:

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