



ARIZONA STATE SENATE
RESEARCH STAFF

JULIA PAULUS
ASSISTANT RESEARCH ANALYST

CHERIE STONE
LEGISLATIVE RESEARCH ANALYST
HEALTH AND HUMAN SERVICES COMMITTEE
Telephone: (602) 926-3171

TO: JOINT LEGISLATIVE AUDIT COMMITTEE

DATE: January 5, 2021

SUBJECT: Sunset Review of the Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers

Attached is the final report of the sunset review of the Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers, which was conducted by the Senate Health and Human Services Committee of Reference. A performance audit of the Board was conducted by the Arizona Office of the Auditor General ([Report No.20-101](#)).

This report has been distributed to the following individuals and agencies:

Governor of the State of Arizona
The Honorable Douglas A. Ducey

President of the Senate
Senator Karen Fann

Speaker of the House of Representatives
Representative Russell Bowers

Senate Members
Senator Kate Brophy McGee, Chair
Senator Sylvia Allen
Senator Heather Carter
Senator Rick Gray
Senator Tony Navarrete
Senator Tyler Pace
Senator Rebecca Rios
Senator Victoria Steele

Secretary of the Senate
Senate Resource Center
Senate Republican Staff
Senate Democratic Staff
Senate Research Staff
Office of the Chief Clerk
House Republican Staff
House Democratic Staff
House Research Staff

Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers
Office of the Auditor General
Arizona State Library, Archives and Public Records

**Senate Health and Human Services
Committee of Reference Report**

**ARIZONA STATE BOARD OF EXAMINERS OF NURSING CARE INSTITUTION
ADMINISTRATORS AND ASSISTED LIVING FACILITY MANAGERS**

Background

The Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers (Board) regulates nursing care institution administrators and assisted living facility managers. Board duties include: 1) adopting rules for licensing and certifying qualified applicants; 2) conducting examinations to determine applicant qualification; 3) adopting application, certification and examination fees; 4) conducting investigations or administrative hearings in response to complaints; 5) prescribing standards for assisted living facility training programs; and 6) reporting to the Legislature ([A.R.S. § 36-446.03](#)).

The Board consists of nine members appointed by the Governor to three-year terms. Members may not serve more than two consecutive terms. The Board is required to meet at least twice annually ([A.R.S. § 36-446.02](#)).

The Board is set to terminate on July 1, 2021, unless legislation is enacted for its continuation ([A.R.S. § 41-3021.11](#)).

Committee of Reference Sunset Review Procedure

The Senate Health and Human Services Committee of Reference conducted a virtual public meeting on Thursday, December 17, 2020 to review the audit report prepared by the Auditor General, evaluate the Board's responses to the sunset factors and receive public testimony.

Committee of Reference Recommendations

The Committee of Reference recommended that the Legislature continue the Board for 8 years until July 1, 2029.

Attachments

- A. Meeting notice
- B. Minutes of Senate Health and Human Services Committee of Reference
- C. Auditor General presentation
- D. Chairman's letter requesting the Board's response to the agency factors
- E. Board's response to the agency factors pursuant to [A.R.S. § 41-2954, subsection F](#)
- F. Electronically submitted public testimony

ARIZONA STATE SENATE

INTERIM MEETING NOTICE OPEN TO THE PUBLIC

SENATE HEALTH AND HUMAN SERVICES COMMITTEE OF REFERENCE FOR THE SUNSET REVIEW OF THE ARIZONA STATE BOARD OF EXAMINERS OF NURSING CARE INSTITUTION ADMINISTRATORS AND ASSISTED LIVING FACILITY MANAGERS, THE SUNSET REVIEW OF THE DEVELOPMENTAL DISABILITIES ADVISORY COUNCIL AND THE SUNSET REVIEW OF THE ARIZONA STATE BOARD OF PODIATRY EXAMINERS

Date: Thursday, December 17, 2020

Time: 1:00 P.M.

Place: This meeting will be held via teleconference software.
Members of the public may access a livestream of the meeting here:
https://azleg.granicus.com/MediaPlayer.php?publish_id=2

AGENDA

1. Call to Order
2. Roll Call
3. Sunset Review of the Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers
 - Presentation by the Office of the Auditor General
 - Response by the Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers
 - Public Testimony
 - Discussion
 - Recommendation by the Committee of Reference
4. Sunset Review of the Developmental Disabilities Advisory Council
 - Response by the Developmental Disabilities Advisory Council
 - Public Testimony
 - Discussion
 - Recommendation by the Committee of Reference
5. Sunset Review of the Arizona State Board of Podiatry Examiners
 - Response by the Arizona State Board of Podiatry Examiners
 - Public Testimony
 - Discussion
 - Recommendation by the Committee of Reference
6. Adjourn

Members:

Senator Kate Brophy McGee, Chair
Senator Sylvia Allen
Senator Heather Carter
Senator Rick Gray
Senator Tony Navarrete
Senator Tyler Pace
Senator Rebecca Rios
Senator Victoria Steele

The public may provide written testimony through email to cstone@azleg.gov prior to 10:00 a.m. on Thursday, December 17, 2020. Submitted testimony will be entered into the record.

12/10/2020

sa

For questions regarding this agenda, please contact Senate Research Department.

Persons with a disability may request a reasonable accommodation such as a sign language interpreter, by contacting the Senate Secretary's Office: (602) 926-4231 (voice). Requests should be made as early as possible to allow time to arrange the accommodation.

ARIZONA STATE SENATE

SENATE HEALTH AND HUMAN SERVICES COMMITTEE OF REFERENCE FOR THE SUNSET REVIEW OF THE ARIZONA STATE BOARD OF EXAMINERS OF NURSING CARE INSTITUTION ADMINISTRATORS AND ASSISTED LIVING FACILITY MANAGERS, THE SUNSET REVIEW OF THE DEVELOPMENTAL DISABILITIES ADVISORY COUNCIL AND THE SUNSET REVIEW OF THE ARIZONA STATE BOARD OF PODIATRY EXAMINERS

**Minutes of the Meeting
December 17, 2020
1:00 P.M.**

This meeting will be held via teleconference software.

Members of the public may access a livestream of the meeting here:

https://azleg.granicus.com/MediaPlayer.php?publish_id=2

Members Present:

- Senator Kate Brophy McGee, Chair
- Senator Sylvia Allen
- Senator Heather Carter
- Senator Rick Gray
- Senator Tony Navarrete
- Senator Rebecca Rios
- Senator Victoria Steele

Members Excused:

- Senator Tyler Pace

Staff:

- Cherie Stone, Senate Research Staff
- Julia Paulus, Senate Research Assistant Analyst

Chairman Brophy McGee called the meeting to order at 1:05 p.m. and attendance was noted.

Senator Brophy McGee noted for the record that this meeting has a quorum.

SUNSET REVIEW OF THE ARIZONA STATE BOARD OF EXAMINERS OF NURSING CARE INSTITUTION ADMINISTRATORS AND ASSISTED LIVING FACILITY MANAGERS

Presentation by the Office of the Auditor General

Dale Chapman, Auditor General’s Office, electronically distributed and explained a PowerPoint presentation entitled "Arizona Board of Nursing Care Institution Administrators and Assisted Living Facility Managers: Performance Audit and Sunset Review Report No. 20-101 Issued February 2020" (Attachment A). Mr. Chapman addressed the findings of the Performance Audit and Sunset Review, including subsequent recommendations to the Board and answered questions posed by the Committee.

Response by the Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers

Allen Imig, Executive Director, Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers, electronically distributed a letter dated February 18, 2020 along with enclosures regarding the sunset review process (Attachment B). Mr. Imig gave an update regarding the Board's response of the Auditor General's Performance Audit and Sunset Review and answered questions posed by the Committee.

Senator Brophy McGee offered comments.

Mr. Imig answered additional questions posed by the Committee.

Senator Brophy McGee welcomed Senator Carter.

Public Testimony

Senator Brophy McGee noted for the record that there were three (3) letters electronically submitted in support of the continuation for the Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers by Karen Barno, representing Arizona Assisted Living Federation of America (Attachment C), David Voepel, representing Arizona Health Care Association (Attachment D), Pam A. Koester, representing LeadingAge Arizona (Attachment E).

Discussion

Senator Gray shared his concern regarding fingerprint clearances and offered comments.

Mr. Imig answered additional questions posed by the Committee.

Recommendation by the Committee of Reference

Senator Brophy McGee requested a motion on the recommendation by the Committee of Reference.

Senator Carter moved that the Committee of Reference make the recommendation to continue the Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers for 8 years. The motion CARRIED by voice vote.

SUNSET REVIEW OF THE DEVELOPMENTAL DISABILITIES ADVISORY COUNCIL

Response by the Developmental Disabilities Advisory Council

Kathy Ber, Legislative Director, Arizona Department of Economic Security, electronically distributed and explained a PowerPoint presentation entitled "Developmental Disabilities Advisory Council Sunset Review" (Attachment F) and answered questions posed by the Committee.

Senator Brophy McGee offered comments.

Rick Hargrove, Member, Developmental Disabilities Advisory Council, answered questions posed by the Committee.

Senator Brophy McGee offered additional comments.

Mr. Hargrove publicly thanked Senator Brophy McGee and offered comments.

Senator Brophy McGee offered additional comments.

Senator Carter publicly thanked Senator Brophy McGee and offered comments.

Senator Brophy McGee publicly thanked Senators Allen and Carter and offered additional comments.

Public Testimony

No public testimony took place.

Discussion

No further discussion took place.

Recommendation by the Committee of Reference

Senator Brophy McGee requested a motion on the recommendation by the Committee of Reference.

Senator Carter moved that the Committee of Reference make the recommendation to continue the Developmental Disabilities Advisory Council for 8 years. The motion CARRIED by voice vote.

SUNSET REVIEW OF THE ARIZONA STATE BOARD OF PODIATRY EXAMINERS

Response by the Arizona State Board of Podiatry Examiners

Heather Broaddus, Executive Director, Arizona Board of Podiatry Examiners, electronically distributed a letter dated August 13, 2020 along with enclosures regarding the sunset review process (Attachment G). Ms. Broaddus gave an update regarding the Board's response of the Auditor General's Sunset Review and answered questions posed by the Committee.

Senator Brophy McGee offered comments.

Public Testimony

Senator Brophy McGee noted that there was no public testimony.

*Cherie Stone, Senate Research Staff, noted after the completion of the meeting, written testimony was emailed from Joseph F. Abate, representing Arizona Foot and Ankle Medical Association, in support of the continuation for the Arizona State Board of Podiatry Examiners (Attachment H).

Discussion

Senator Brophy McGee asked if there was any further discussion.

No further discussion took place.

Recommendation by the Committee of Reference

Senator Brophy McGee requested a motion on the recommendation by the Committee of Reference.

Senator Carter moved that the Committee of Reference make the recommendation to continue the Arizona State Board of Podiatry Examiners for 8 years. The motion CARRIED by voice vote.

Senator Brophy McGee made closing comments and thanked the Committee members for all their hard work and dedication to serving the people of Arizona.

Senator Brophy McGee thanked staff and made closing comments.

There being no further business, the meeting was adjourned at 1:52 p.m.

Respectfully submitted,

Imee L. Andrew
Committee Secretary
Audio and Video Transcription

(Audio recordings and attachments are on file in the Secretary of the Senate's Office/Resource Center, Room 115. Audio archives are available at <http://www.azleg.gov>)



Arizona Board of Nursing Care Institution Administrators and Assisted Living Facility Managers

Performance Audit and Sunset Review

Report 20-101

Issued February 2020

Presenter: Dale Chapman

Date: December 17, 2020

Board regulates administrators and managers



Licenses/
certifies
professionals

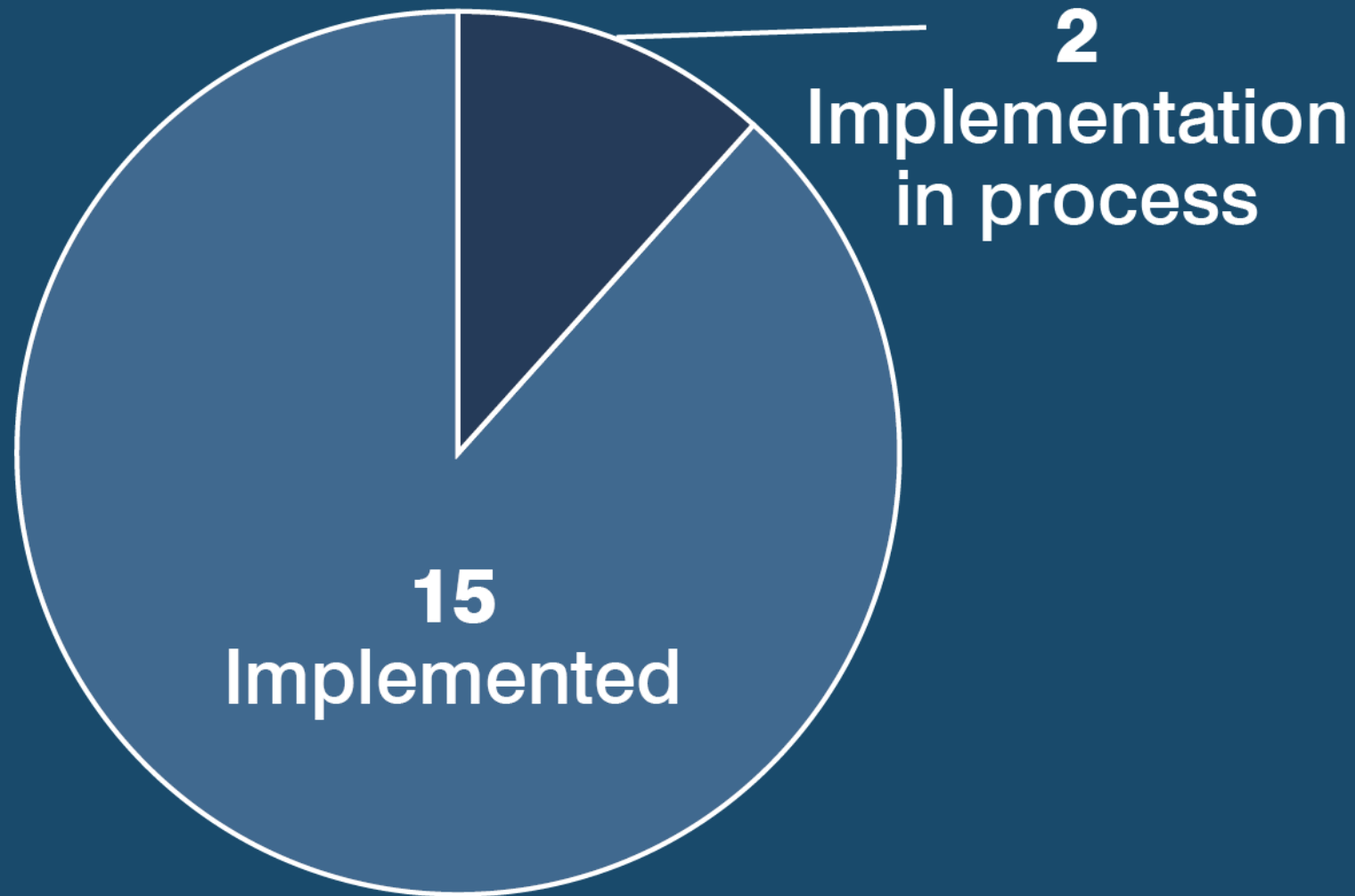
Investigates and
adjudicates
complaints

Provides
information to
the public

As of October 2019:

- 337 licensed nursing care institution administrators
- 2,093 certified assisted living facility managers

Board implemented most of the 17 audit recommendations as of October 2020



Board did not ensure applicants met some requirements



Fingerprint clearance card application requirement

Initial applications



Board lacked evidence
of fingerprint clearance
cards for
2 of 32 applications

Renewal applications



Board did not verify
fingerprint clearance
card validity for
all 10 applications

Valid fingerprint clearance cards are an important application requirement

- Administrators and managers may work with vulnerable populations
- Cards help determine if an applicant has been convicted of a statutorily precluding criminal offense

Status of recommendation—Board verifies fingerprint clearance card validity for initial and renewal applicants

Board was not timely in handling some complaints



20 complaints reviewed for timeliness



15 took less than
180 days



5 were open between
223 and 589 days

Untimely complaint handling may put some residents at risk



- Administrators or managers with alleged violations may work during investigation, even though they may be unfit
- For the 5 untimely complaints: 1 was dismissed but 4 resulted in revoking a manager's certificate or a manager entering into a consent agreement

Status of recommendations—Board monitors complaint-handling timeliness and updates Board members monthly

Board did not provide adequate public information



Board provided inaccurate or insufficient information for all 3 anonymous calls we made



Status of recommendation—Board modified policies and procedures but was in process of ensuring staff compliance with them

Reimbursement of investigative costs was not based on costs or consistent

Reimbursements of investigative costs for 8 consent agreements we reviewed



1 did not require a reimbursement at all



7 varied between \$100 and \$500



In reviewing Board revenues, we also noted a reimbursement for \$1,500

Status of recommendations—Board reviews investigative costs and has policies and procedures to justify reimbursement amounts

Arizona Board of Nursing Care Institution Administrators and Assisted Living Facility Managers

Performance Audit and Sunset Review

Report 20-101

Issued February 2020

Presenter: Dale Chapman

Date: December 17, 2020



Arizona State Senate

January 6, 2021

Allen Imig

Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers
1740 W. Adams, suite 2490, Phoenix, AZ 85007

Dear Director Imig:

The sunset review process prescribed in Title 41, Chapter 27, Arizona Revised Statutes, provides a system for the Legislature to evaluate the need to continue the existence of state agencies. During the sunset review process, an agency is reviewed by legislative committees of reference. On completion of the sunset review, the committees of reference recommend to continue, revise, consolidate or terminate the agency.

The Joint Legislative Audit Committee (JLAC) has assigned the sunset review of the Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers to committees of reference comprised of members of the Senate Health and Human Services and the House of Representatives Health and Human Services. JLAC has directed the Auditor General to conduct a performance audit of the Arizona State Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers.

Pursuant to A.R.S. § 41-2954, the committee of reference is required to consider certain sunset factors in deciding whether to recommend continuance, modification or termination of an agency. In addition to the 12 sunset factors, which are addressed in the Auditor General performance audit, please provide your agency's written response to the required factors as listed below:

1. An identification of the problem or the needs that the agency is intended to address.
2. A statement, to the extent practicable, in quantitative and qualitative terms, of the objectives of such agency and its anticipated accomplishments.
3. An identification of any other agencies having similar, conflicting or duplicate objectives, and an explanation of the manner in which the agency avoids duplication or conflict with other such agencies.
4. An assessment of the consequences of eliminating the agency or of consolidating it with another agency.
5. The extent to which the agency potentially creates unexpected negative consequences that might require additional review by the committee of reference, including increasing the price

of goods, affecting the availability of services, limiting the abilities of individuals and businesses to operate efficiently and increasing the cost of government.

Your response should be received by September 1, so we may proceed with the sunset review and schedule the required public hearing. Please submit the requested information to:

Cherie Stone
Arizona State Senate
1700 West Washington
Phoenix, Arizona 85007

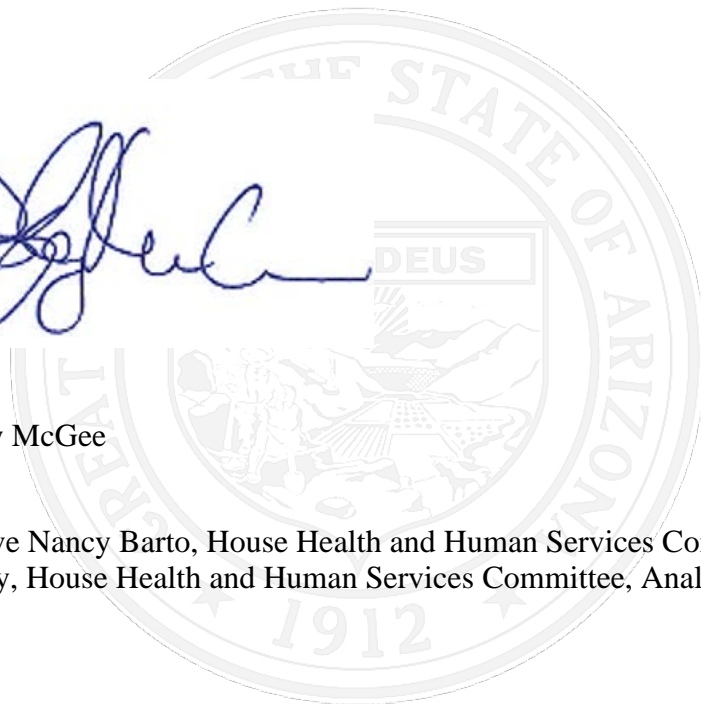
Thank you for your time and cooperation. If you have any questions, please feel free to contact me at (602) 926-4486 or Cherie Stone, the Senate Health and Human Services Committee Research Analyst, at 602-926-3171.

Sincerely,



Senator Kate Brophy McGee

cc: Representative Nancy Barto, House Health and Human Services Committee, Chair
Ingrid Garvey, House Health and Human Services Committee, Analyst





**BOARD OF EXAMINERS OF NURSING CARE INSTITUTION ADMINISTRATORS AND
ASSISTED LIVING FACILITY MANAGERS**

Douglas A. Ducey
Governor

1740 W. Adams, Suite 2490 Phoenix, Arizona 85007
(602)364-2374 phone (602)542-8316 fax
Email: allen.imig@aznciaboard.us Website: www.aznciaboard.us

Allen Imig
Executive Director

September 1, 2020

Senator Kate Brophy McGee
Arizona State Senate
1700 W. Washington
Phoenix, AZ 85007

RE: Sunset factors pursuant to A.R.S. §41-2954

Dear Senator Brophy McGee

In accordance with the provisions of A.R.S. §41-2954 and in response to your letter dated June 8, 2020, I offer the following response to the sunset consideration factors as follows:

1. Identify the problem or the needs that the agency is intended to address.

A. The following are legislative considerations for the Board:

Amend or repeal articles in statute to:

- Reduce burden on applicants
- Improve the statutes clarity, conciseness, and understandability
- Conform to eLicense system

2. State, to the extent practicable, in quantitative and qualitative terms, of the objectives of the agency and its anticipated accomplishments.

Licensing:

- The Board's statutory requirement to license nursing care institution administrators, certify assisted living facility managers, and approved caregiver and manager training programs that meet the minimum requirements will continue. The Board meets monthly in a public forum to conduct its business. As of August 31, 2020, the Board has:
 - 2351 certified assisted living facility managers
 - 322 nursing care institution administrators
 - 73 assisted living facility caregiver training programs
 - 15 assisted living facility manager training programs
- The Board will continue to meet the established time-frames for issuing and renewing licenses and certificates.

Complaints:

- The Board has developed and implemented policies and procedures to ensure the grounds for disciplinary action and the disciplinary processes are enforced in a timely manner.
- The Board continues to work with licensees and certificate holders to correct deficiencies or violations through the disciplinary process to ensure long term care and assisted living residents are protected. The Board would rather take corrective action by imposing remedial training or continuing education as opposed to punitive disciplinary actions to bring the licensee back into compliance.

For FY20 the Board did the following on complaints:

- 157 new complaints were opened
- 166 were reviewed by the Board
- 80 received a term of probation or proceeded to a formal hearing
- 62 were dismissed
- 21 received a letter of concern

3. Identify any other Agencies having similar, conflicting or duplicate objectives, and an explanation of the manner in which the agency avoids duplication or conflict with other such agency.

The Board has not identified any other local, state, federal or private-sector organization with similar or duplicative objectives as those of the Arizona Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers.

The Board has never identified any organization, public or private, whose mission or objectives conflict with those of the Arizona Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers.

4. Assess the consequences of eliminating the agency or of consolidating it with another agency.

Termination of the Board would disqualify the state from participating in the federal Medicare/Medicaid funding programs as established by U.S. Code, Title 42, Chapter 7, Subchapter XIX, Section 1396a (a) (29) and 1396g. This would directly affect the public by eliminating a significant amount of federal funds.

Terminating the Board would significantly endanger the public health, safety, and welfare. The Board has imposed disciplinary action against a number of licensees and certificate holders who posed a threat to the public's health, safety and welfare by virtue of their conduct. Some of the unprofessional conduct committed by these licensees (or former licensees) include: abuse, neglect, exploitation, sexual misconduct, substandard care of residents, improper medication administration, and providing services outside their scope.

The Board has determined that elimination of the agency would place the public at risk for harm from incompetent and unethical skilled nursing facility administrators or assisted living managers. No alternative agency (local, state or

federal) is currently in a position to assume the responsibility of determining and evaluating the qualifications associated with licensing of skilled nursing facility administrators or certifying assisted living managers. Nor is there an appropriate alternative agency prepared to investigate and enforce standards of practice and care for which the Arizona Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers is currently responsible. The Board also does not believe that consolidation into another agency or of the independent professions would be in the best interest of the public, nor of the professions, for the following reasons:

- The Board is made up of professional long term care administrators, assisted living facility managers and public members, thus giving both professional expertise and insight along with consumer input into the decision making process when a licensee is faced with a complaint regarding their professional conduct. Consolidation would dilute the professional component and eliminate the consumer input.
- Being an independent Board does not mean it operates inefficiently. The levels of bureaucracy are reduced and the chain of command is very short. Each employee is an expert in their specific area, such as investigations and licensing, thus requiring minimal management oversight. Because of this, decisions are made quickly, policies and procedures can be evaluated and changed in a short time, staff questions are answered immediately, consumer complaints are resolved rapidly, staff is immediately assessable to accurately answer both professional and consumers questions. Consolidation would increase bureaucracy, lengthen the chain of command, dilute staff expertise, reduce consumer accessibility, and increase the time it takes to resolve complaints.
- As a self-supporting regulatory 90/10 board it pays its own way to regulate the profession, with no cost to the taxpayers of Arizona, with 10% of revenue going to the State general fund. This structure gives consistency in providing services that protect the public, without struggling with general fund budget shortfalls and cuts, yet the legislature retains oversight.

5. The extent to which the agency potentially creates unexpected negative consequences that might require additional review by the committee of reference, including increasing the price of goods, affecting the availability of services, limiting the abilities of individuals and businesses to operate efficiently and increasing the cost of government.

Arizona Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers have not identified any unexpected negative consequences such as fee increases or regulations that would limit the abilities of individuals and business to operate efficiently.

The Board strives to reduce regulatory barriers without compromising the Board's mission.

On behalf of the Arizona Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers, I thank you for the opportunity to respond to these questions.

Respectfully,

A handwritten signature in black ink, appearing to read "Allen Imig". The signature is fluid and cursive, with a long horizontal stroke at the end.

Allen Imig
Executive Director



ARIZONA HEALTH CARE ASSOCIATION

1440 EAST MISSOURI AVENUE, SUITE C-102
PHOENIX, ARIZONA 85014-2458
602-265-5331
F: 602-265-4401
WWW.AZHCA.ORG

Heather Friebus
President

Devon Gables Rehabilitation Center

Brett Robertson
Vice President
Haven Health Group

Kelly Bojorquez
Secretary-Treasurer
The Forum at Desert Harbor

Matt Ham
Immediate Past President
Life Care Centers of America

John Albrechtsen
Region 3
Bandera Healthcare

Brian Elison
Business Affiliate Rep
Medline Industries, Inc.

Heather Hudson
Region 3
Prescott Nursing & Rehabilitation
Center

Mason Hunter
Region 3
Haven Health Group

Amy Malkin
Region 2
Santa Rita Nursing and Rehabilitation

Terry Speth
Region 1
Citadel Post Acute
Bandera Healthcare

David Starrett
Region 1
Plaza Healthcare

Kristopher Woolley
Region 1
Avista Senior Living

John Checkett
AHCA General Counsel
Checkett Law Offices

David A. Voepel
Chief Executive Officer



December 4, 20202

Allen Imig
Executive Director
Nursing Care Institution Board
1740 W Adams Street
Phoenix, AZ 85007

Dear Allen:

I am writing to offer the Arizona Health Care Association's (AHCA) support for the renewal of the NCIA Board, as your Sunset Review hearing will be held soon.

AHCA greatly appreciates the spirit of collaboration exemplified by the NCIA board under your leadership. Our partnership in delivering continuing education units is just one example of that. We also value the timeliness of investigations and the fact that, due to your efficiency, there is no backlog of investigations for administrators. We also commend you for your speed in approving new administrator licenses, as this is so important to the efficacy of skilled nursing facility operations.

We have also worked cooperatively in recent years on rule changes that have been essential to the long term care profession. The monthly NCIA board meetings are conducted openly and fairly. These are critical concerns we have had in the past that have been successfully resolved under your leadership.

I look forward to future cooperation between AHCA and the NCIA board. Thank you for your commitment to serving the long term care community.

Sincerely,

David Voepel
CEO



December 10, 2020

To Whom It May Concern:

Arizona LeadingAge supports the continuation of the NCIA Board. Arizona LeadingAge is the trusted voice for not-for-profit and other mission-driven organizations dedicated to providing quality housing, health care and community-based services for Arizona's seniors. As such, we work with the NCIA Board on a regular basis regarding issues of licensure and certification.

Arizona LeadingAge believes the NCIA Board properly regulates nursing care institution administrators and assisted living facility managers. When seeking to identify improvements to existing rules, policies and procedures, the Board welcomes feedback from the industry. In addition, we have personally attended Board meetings where the Board addresses new certificates and renewals of certificates. We have found that the Board strives to fulfill its responsibilities in a professional manner.

The impact of our industry on the lives of seniors can not be overstated. The individuals we serve are some of the most vulnerable. The NCIA Board's mission to protect the health, welfare, and safety of Arizona citizens who seek and use the services of nursing care institution administrators and assisted living facility managers is critical to our industry.

Please do not hesitate to contact me if you have any questions.

Respectfully,

A handwritten signature in black ink that reads "Pam A. Koester".

Pam A. Koester, CEO
Arizona LeadingAge

Expanding the world of possibilities for aging.

3877 N. 7th Street, #280, Phoenix, AZ 85014 p. 602.230.0026, f. 602.230.0563, www.ArizonaLeadingAge.org

December 8, 2020

Allen Imig
Executive Director
Nursing Care Institution Board
1740 W Adam Street
Phoenix, AZ 85007

Dear Allen:

I am writing to offer the Arizona Assisted Living Federation of America (AZ ALFA) support for the renewal of the NCIA Board, as your Sunset Review hearing is approaching.

Arizona ALFA has been working with the NCIA board for over 24 years, and the partnership we have been able to establish under your leadership has been impeccable. Allen, you have always worked diligently to guarantee the success of continuing education for Arizona ALFA members, including joining us as a speaker. We highly appreciate the thoughtfulness you put into your work to ensure the turnaround time for managers' licensed renewal is minimal and correct. The changes you were able to make for the 2021 managers license renewal due to COVID-19 were a major accomplishment that genuinely lifted the stress from many Arizona ALFA members.

Allen, we appreciate the herculean effort on your part to expedite the rules process allowing for on-the-job training for potential caregivers. That will have a significant impact on reducing the workforce shortage in healthcare.

We would like to recognize the rule changes we collaborate on with you to help advance assisted living in Arizona. Our members are always appreciative of the respect your board gives to AL managers regarding promptness on investigations.

Arizona ALFA always felt that our concerns were being heard and taken seriously under your leadership, for that, we thank you.

Arizona ALFA looks forward to the continued relationship with the NCIA board. Thank you for the many years of support for the long-term care community!



Karen Barno
President/CEO