

November 14, 2024

Senator Nicole Cannizzaro, Chair
Legislative Commission
401 South Carson Street
Carson City, NV 89706

Dear Chair Cannizzaro,

On behalf of Dignity Health St. Rose Dominican and our seven acute care hospitals in Southern Nevada, we would like to express our strong support for the adoption of regulation R004-24 in its current form which implements AB267 from the 2023 legislative session.

At the Board of Health adoption hearing in September, St. Rose advocated for an amendment to Section 11. In its previous version, the regulations would have required St. Rose to undergo the development and implementation of an additional training program for newly hired employees. Our request to revise the minimum hours training requirements in section 11 received unanimous approval from the State Board of Health, and allows St. Rose to continue offering its currently-approved training, without incurring significant financial impacts to the system or reducing the amount or quality of training which has been offered to all St. Rose patient-facing employees prior to the AB167 (2023) mandate becoming effective.

St. Rose currently operates a self-developed cultural competency training program, which was approved under the more comprehensive regulatory framework from the initial 2019 enactment based on its comprehensive coverage of all required elements within a 90-minute timeframe. The program has been meticulously designed to meet the needs of our patients, while ensuring compliance with all necessary standards for cultural competency education from Nevada's robust statutory and regulatory framework, in a manner that will not unduly harm or burden our not-for-profit system.

We take pride in our mission to treat all individuals with dignity and respect and our 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.

We would also like to thank the Bureau of Health Care Quality and Compliance in the Division of Public and Behavioral Health for their work on this regulation and their willingness to hear out our concerns during the regulatory process.

We appreciate the Commission's consideration of the regulations and look forward to seeing its passage.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K Vergos', with a stylized, cursive script.

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

cc:

Legislative Counsel Bureau

Cody Phinney, Administrator, Division of Public and Behavioral Health

Kyle Devine, Deputy Administrator, Division of Public and Behavioral Health

Paul Shubert, Chief, Bureau of Health Care Quality and Compliance, Division of Public and Behavioral Health