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[www.micounties.org](http://www.micounties.org)  
**Stephan W. Currie, Executive Director**

November 8, 2023

**RE: House Health Policy Committee Hearing on Nurse Staffing Ratio Bills, House Bills 4550-4552**

Rep. Julie Rogers  
Chair  
House Committee on Health Policy  
Room 519, House Office Building  
Lansing, MI 48933

Dear Chair Rogers and Members of the House Committee on Health Policy:

The Michigan Association of Counties (MAC) wishes to clarify our position on the Nurse Staffing Ratio Legislation, House Bills 4550-4552.

MAC, alongside the 34 counties that are home to County Medical Care Facilities (MCF's), is proud to support the Michigan County Medical Care Facilities Council and County MCF's in our state. Counties that are home to medical care facilities often contribute to the operation of those facilities, and MCF's are able to access Medicaid Reimbursement through the Maintenance of Effort funded by each county.

Many County Medical Care Facilities are in rural counties and tend to be a significant employer within the county. County MCF's are already facing staffing shortages and funding delays as a result of the COVID-19 pandemic. Imposing staffing ratio mandates on hospitals would lead to a ripple effect on County MCF's, thus forcing one of the largest employers within a county with an MCF to grapple with even further staffing shortages. With limited government funding, County MCF's face difficult decisions when it comes to recruiting and retaining nurses. In addition to current staffing shortages, County MCF's are already forced to compete with hospitals, which are able to provide higher wages.

The Federal Centers for Medicare and Medicaid Services has proposed a new staffing mandate, likely to go into effect in the next 2-3 years. This mandate would increase overall nurse staffing and RN requirements, increasing competition in an already limited nursing staff pool, especially for County Medical Care Facilities.

County Medical Care Facilities are the "safety-net providers" for Michigan's most vulnerable population in need of skilled nursing care, regardless of a patient's ability to pay. County MCF's have a higher Medicaid population than Class 1 providers, and without them, quality and affordable skilled nursing care would be lost in many communities.



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In addition to County Medical Care Facilities, there are currently 7 county hospital facilities in Michigan, 5 of which are in the Upper Peninsula. Rural county hospitals are facing staffing shortages similar to County MCF's, especially in rural areas, and do not have enough nurses within their communities to recruit and retain.

Again, MAC supports the needs of County Medical Care Facilities and county hospitals. While our position on this legislation is not entirely in opposition, we wish to recognize the ripple effect that this legislation would have on County MCF's and its direct impact on county hospitals.

MAC looks forward to working with the bill sponsors to address the statewide nurse staffing shortage in Michigan.

Respectfully,

Stephan W. Currie  
Executive Director  
Michigan Association of Counties