



March 30, 2020

National Governors Association
444 N Capitol Street NW
Washington, D.C. 20001

Governor Hogan,

Governors, along with state agencies and legislators across the country are leading the charge against the COVID-19 pandemic. At the time of this letter, over half of the states have closed non-essential businesses to combat the spread of the disease and ensure the health and safety of their residents. As critical healthcare infrastructures are stretched to their limit, International Franchise Association members stand ready to provide support and relief to benefit Americans in every state.

The International Franchise Association is the world's oldest and largest organization representing franchising worldwide. IFA works through its government relations and public policy, media relations and educational programs to protect, enhance and promote franchising and the more than 733,000 franchise establishments that support nearly 7.6 million direct jobs, \$674 billion of economic output for the U.S. economy and 3 percent of the Gross Domestic Product (GDP). IFA members include franchise companies in over 300 different business format categories including a number of health care businesses.

In times of crises, governments must implement proactive measures to support their citizens. To ensure the highest standard of care for residents and relieve the burden on our healthcare system, IFA urges state governments to implement the following recommendations:

- Allow retired certified nursing assistants (CNA) and those with expired licenses to provide care under a Joint Commission Accredited Home Care Agency as CNAs without requiring them to reapply;
- Recognize other states nursing licenses to ensure that areas in need have access to as many skilled professionals as possible;
- Allow virtual assessments, re-assessments, and supervisory visits to reduce exposure for high-risk seniors;
- Suspend required approval of separate skilled licenses for home care companies that follow Joint Commission accreditation standards;
 - New and existing franchisees are expanding to meet the need, but expediting the process is critical to success.
- Suspend scope of practice requirements to allow trained CNAs and home health aides (HHA) to perform COVID-19 testing and dispense approved medication for COVID-19 based upon CDC protocol;
- Temporarily allow trained CNAs and HHAs working for a Joint Commission accredited agency to dispense medications for high-risk clients receiving home care services;

- Grant authority for health care and home care employers to test front line employees for COVID-19 with state government funding of both testing kits and lab processing;
- Suspend background check and drug screen requirements for 60 days to fast hire licensed personnel with a valid license in good standing.

According to the U.S. Bureau of Labor Statistics, there are more than 800,000 home health aides and 1.5 million certified nursing assistants across the country. CNAs and HHAs provide valuable services to the populations that are the most vulnerable to the spread of COVID 19. By implementing these recommendations, states will ensure that more healthcare professionals are available to provide proactive support and treatment. In turn, hospitals visits are reduced and needed relief is provided to overburdened healthcare systems.

IFA stands ready to provide additional information and answer questions upon request. We look forward to working with state governments to benefit their residents moving forward.

Best Regards,



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