



July 15, 2020

State of Alaska  
Department of Health and Social Services  
Division of Public Health, Section of Rural & Community Health Systems  
SHARP Program  
Attn. Robert Sewell  
PO BOX 110616  
Juneau, AK 99811-0616  
Sent via email to [sharp.inquiry@alaska.gov](mailto:sharp.inquiry@alaska.gov)

Subject: Comments on 7 AAC 24/Health Care Professionals Workforce Enhancement Program

Dear Dr. Sewell:

Thank you for the opportunity to comment on proposed changes to regulations, 7 AAC 24, Health Care Professionals Workforce Enhancement Program. The Mat-Su Health Foundation (MSHF) is the official business name of Valley Hospital Association. The MSHF shares ownership in Mat-Su Regional Medical Center and invests its profits from that partnership back into the community to improve the health and wellness of Alaskans living in the Mat-Su.

Workforce Development is a key Mat-Su Health Foundation focus area, and we are committed to filling gaps in the community's healthcare workforce through programs that include scholarships, professional development opportunities, and support of the SHARP program. We have invested \$25,000 over the last three years to support seven new healthcare practitioners in Mat-Su: five in Behavioral Health and two in nursing. Since the inception of the SHARP program our community has benefited from 45 practitioners who may not have been here otherwise.

The Mat-Su Health Foundation fully supports the Health Care Professionals Workforce Enhancement Program and the proposed changes to its regulations. We have one recommendation that we believe would enhance the proposed regulations: please consider adding the title (SHARP) in parenthesis at the end of each reference to "Health Care Professionals Enhancement Program." SHARP is the common nomenclature by which professionals and organizations in the health care industry know this program, and adding it will help clarify the regulations.

Thank you for this opportunity to comment.

Sincerely,

Elizabeth Ripley  
Chief Executive Officer

July 14, 2020

Alaska Department of Health and Social Services  
Division of Public Health, Section of Rural & Community Health Systems  
SHARP Program, Attn: Robert Sewell

Re: Comments on 7 AAC 24/Health Care Professionals Workforce Enhancement Program

Dear Dr. Sewell:

The SHARP 3/Health Care Professionals Workforce Enhancement Program will be an excellent recruitment and retention tool for strengthening Alaska's workforce and directly improving the lives of Trust beneficiaries. The Trust appreciates the Department's leadership and the effort that has gone into creating and administering the SHARP program over the last eleven years.

While we strongly support the SHARP 3 program, we believe the proposed regulations could be enhanced to better serve the State and Trust beneficiaries with the changes outlined below. Please note that Trust recommendations apply to the Health Care Professionals Workforce Enhancement Program dated July 1, 2020.

Recommendations:

1) 7 AAC 24. Health Care Professionals Workforce Enhancement Program. In this section, we recommend adding the title SHARP in parenthesis at the end of each reference to these regulations titled "Health Care Professionals Enhancement Program." SHARP is the common nomenclature by which professionals and organizations in the health care industry know this program, and it would be confusing to drop it from the name.

2) 7 AAC 24.310. Advisory Council Duties (a). In this section we recommend adding to the duties of the advisory council the receipt and review of a fiscal report from Division of Public Health twice a year, so that Council members can monitor the financial integrity of the program.

Thank you for this opportunity to comment on the proposed regulations. If you have any questions please contact Eric Boyer 782-5029.

Sincerely,



Michael K. Abbott  
CEO



July 15, 2020

Submitted by email to: [sharp.inquiry@alaska.gov](mailto:sharp.inquiry@alaska.gov)

The Alaska State Hospital and Nursing Home Association (ASHNHA) is submitting comments on the Department of Health and Social Services proposed changes to regulations 7 AAC 24: Health Care Professionals Workforce Enhancement Program.

ASHNHA supports SHARP 3 Health Care Professionals Workforce Enhancement Program as a public-private partnership. We support the purpose of the program to increase access to health care services for all Alaskans by improving recruitment, retention and distribution of health care professionals by providing financial support-for-service through loan repayment or direct incentive to health care professionals to serve all Alaskans, especially the underserved.

Overall we support the proposed regulations and have a few specific comments on details in the proposed regulations as outlined below

**7 AAC 24.110. Employer site eligibility.** *A site must meet the following requirements to participate in the program:*

*(1) ensure that the health care professional charges for provided services at the usual and customary rates in the employer's area, except that if a service recipient is unable to pay such fee, that individual will be charged at a reduced rate or not charged any fee.*

We would recommend adding the following language to this item: **or there is a hospital charity care process available for patients unable to pay.** Explanation: Most hospitals do not reduce rates or offer sliding fee scales but do have charity care policies that are available to individuals unable to pay.

#### **7 AAC 24.150. Program Fees.**

We support the addition of administrative fees and a fiscal agent fee to help cover the administrative cost of program. Time will tell if the fees charged are a deterrent to employer participation in the program. We hope they will not reduce participation by employers. The higher the fees the more likely they are to reduce the benefit employers will get by participating in state workforce enhancement program compared to paying an incentive or loan repayment directly to an employee.

#### **Article 2. Advisory Council**

ASHNHA supports the continued use of an advisory council to guide the development of the program. The additional clarifications provided by the regulations will strengthen the work of the council.

## 7 AAC 24.400. Definitions

**(8) “full-time position”** means a program-eligible position in which the health care professional works at least 40 hours per week in at least one contract-specified site; the 40 hours per week may occur in no less than four days per week, with no more than 12 hours of work to be performed in any 24-hour period; the health care professional may be a full-time employee but have only half-time program participation;

Comments on the definition of “full-time position. Hospitals may rely on 12 hour shifts to staff the hospital. In this case health care professionals working full-time may work three 12 hour shifts in a week with 36 hours per week meeting the requirement for full-time by the hospital. Change the definition of full-time to allow a health care professional to be considered full-time based on the employer’s policy and definition of full-time rather than a specific number of days/week or hours.

Thank you for the opportunity to provide comments on the proposed regulations.

Sincerely,



Jeannie Monk  
Senior Vice President