May 3, 2021

Jeff Davis  
Director of Ohio Department of Developmental Disabilities  
30 E. Broad Street  
Columbus, OH 43215

Dear Director Davis,

The Ohio Provider Resource Association would like to take this opportunity to thank you for your continued diligence as we navigate through the pandemic which has affected so many of our fellow Ohioans with intellectual and developmental disabilities (I/DD). The work that the department and our fellow providers have performed during this unprecedented time has been nothing short of incredible. With that being said, OPRA would like to take this opportunity to discuss a proposal regarding Rule 5123: 2-6-04 which discusses the qualifications for a Registered Nurse.

This past year, Ohio and the nation have seen an unprecedented event in which our nurses in our field stepped to the forefront to ensure those with Intellectual and Developmental Disabilities can continue to live safely within their communities. Ohio’s nurses within the I/DD field, along with our Direct Support Professionals, are true Front Line Heroes.

With that being said, OPRA recognizes the immense challenges that our residential waiver providers face in regard to nursing. Presently, the American Nursing Association projects that more registered nursing jobs will be available in 2022 than in any other profession in the United States. Additionally, the national turnover rate for nurses is around 17%. In light of the high turnover rate, Ohio’s residential waiver providers often struggle to hire nurses for the I/DD field due to some of the requirements under the nursing rule.

Under current requirements of the rule, nurses eligible to be hired by a provider of services must have at least 18 months experience working as an RN and must have I/DD specific experience. These requirements often make it difficult for Ohio’s residential waiver providers to attract and hire a qualified candidate. Hiring RN’s under the current requirements during the pandemic has been incredibly challenging for Ohio’s residential providers.

In light of the current pandemic / national emergency, difficult pre-requisite hiring requirements, and the current overwhelming need for nurses in the I/DD field, OPRA would like to propose that the current Nursing Rule be opened under emergent circumstances to provide the Director of the Department of Developmental Disabilities the right to waive these requirements during the national emergency. We believe that waiving the requirements mentioned above will assist our residential waiver providers to ensure they have adequate nurses to care for the I/DD population they serve for now and the foreseeable future.

On behalf of OPRA, our membership, and the individuals with I/DD served, we appreciate the opportunity and consideration of this proposal and look forward to further discussion.

Sincerely,