

# **Supplemental Nursing Services**

A Report to the Minnesota Legislature

# Supplemental Nursing Services

## A Report to the Minnesota Legislature

Minnesota Department of Human Services  
Aging Initiative

April 16, 2003

Prepared by the Department of Human Services  
Continuing Care for the Elderly Division  
444 Lafayette Road North  
St. Paul, MN 55155-3836  
(651) 297-3583

(The approximate cost to produce this report was \$3,589.)

## I. INTRODUCTION

Minnesota Statutes, Chapter 256B.039, requires the Commissioner of the Department of Human Services (DHS) to report annually to the legislature on the use of supplemental nursing services, including the number of hours worked by supplemental nursing services agency (SNSA) personnel and payments to supplemental nursing services agencies. “SNSA” and “pool” are used interchangeably.

**Summary and Background Information.** The 2001 legislature enacted new requirements for SNSAs. An SNSA is defined as a person, firm, corporation, partnership, or association engaged for hire in the business of providing or procuring temporary employment in health care facilities for nurses, nursing assistants, nurse aides, and orderlies.

The SNSA law, at Minnesota Statutes 144A.70 to 144A.74 was prompted by reports of excessive charges to nursing facilities for nursing services, poorly trained staff, recruiting of nursing facility staff to work for the SNSA, failure of some SNSAs to provide workers’ compensation and payroll withholding, and unavailability during hard-to-fill shifts. The law includes requirements that SNSAs:

- < register with the Minnesota Department of Health (MDH)
- < document the competency of their staff to perform nursing services
- < carry malpractice insurance
- < not charge fees to nursing facilities when one of the SNSA’s staff is hired by the facility
- < provide, when requested by a health care facility, at least 30 percent of their hours during night, holiday, or weekend shifts.

Additionally:

- < penalties for violations of these requirements are established
- < MDH is required to set a system to handle complaints against SNSAs; and
- < the Commissioner of Human Services is to assist the Commissioner of Health to set the maximum rates an SNSA can charge nursing facilities for supplying nursing staff.

The law was to have taken effect on August 31, 2001. However, a coalition of SNSAs challenged its validity in US District Court, seeking a temporary restraining order (TRO) and, later, an injunction. The TRO was granted on August 30, 2001, but the permanent injunction was denied except on the portion of the law that exempted in-house pools from the regulations. The law became effective on January 2, 2002. The injunction became moot when the 2002 legislature amended the law in a manner acceptable to all interested parties.

## II. Maximum charges

Under the 2001 legislation, an SNSA must not bill or receive payments from a licensed nursing home at a rate higher than 150 percent of the weighted average wage rate for the applicable employee classification for the geographic group to which the nursing home is assigned under Minnesota Rules, part 9549.0052<sup>1</sup>. The legislation gives no further guidance as to how the rates are to be computed. It does not define what a weighted wage rate is or how it should be computed. Neither does it define the employee classifications.

DHS computed the maximum charges and issued them to MDH on July 26, 2001 (Table 1). Within each geographic group, for the employee classifications of registered nurse (RN), licensed practical nurse (LPN), and certified nursing assistant (CNA), the average wage per hour, by employee classification, reported by the nursing homes was multiplied by the 150% factor to determine the rates.

The SNSAs took issue with the rates because they thought they were too low. The SNSAs generated several ideas, at a meeting with MDH and DHS, as to how the rates could be modified. The ideas were:

- < include fringe benefit costs in the calculations
- < use amounts paid to in-house pools or emergency fill-ins
- < increase the maximum charges to recognize individuals who disregard benefits for increased pay (independent contractors)
- < the law says “determine” rather than “compute” the maximum charges; therefore be liberal in what is included in the determination
- < include step increases
- < delay implementation until more data is collected
- < include weekend differentials, shift differentials, and overtime pay
- < have a separate set of rates for holidays
- < use an inflation factor to recognize that a year has passed from when the employee data was generated to the date the maximum charges begin.

Of these ideas, the department decided that the last three had merit and reissued the maximum charges list on August 16 (Table 2). Since DHS had no data on the amounts and frequency of weekend and shift differentials or overtime pay, data collected by the nursing home trade associations was used. At the time, DHS felt it is better to include something for these factors than to state there is no way to factor the components into the maximum charges.

---

<sup>1</sup> Geographic groups are established in Rule 50 (Minnesota Rules 9549.0010 -9549.0080). Attachment A lists which counties are in which geographic group.

On August 28, the rates were corrected to reflect the weighting of the average wage rates by the number of employees in the facility. DHS had intended to include this methodology in the original calculations, but had erroneously used unweighted rates as the basis of the maximum charges sent to MDH (Table 3).

While the legal action regarding the TRO and injunction were occurring, DHS collected new data from licensed nursing homes on wages paid, hours worked, number of employees for a pay period in August 2001, holiday differentials, and number of recognized holidays. DHS analyzed the data for inconsistencies and errors—calling nursing facilities as necessary for clarifications and corrections. Maximum charge rates computed from this information were issued on December 18 (Table 4). This release of data included a separate table for holiday pay and a classification for trained medication aide (TMA) for which DHS did not have separate data until the August data request.

Finally, effective April 9, 2002, the charges were adjusted based on legislation passed under Laws of Minnesota 2002, Chapter 287 (Table 5). This change updated the rates to cover through June 30, 2003.

### **III. Data Available**

Including a year-by-year comparison of SNSA data is not possible for all facilities. Under Minnesota Statutes 256B.434 (commonly known as the APS statute), nursing facilities have been allowed to remove themselves from the Rule 50 method of rate setting since 1996. Before then, Rule 50 was the mechanism by which nursing facility rates were set and they were based on historical costs. When a facility moves to APS, it files a “data collection report” rather than a Rule 50 cost report. The data collection report does not require the facilities to report costs, only selected statistical data. Without the cost data, a trend analysis of all nursing facility expenses related to SNSA’s cannot be produced. Starting in 2001 the data collection report did include dollar amounts for some positions. Therefore, the data for the years 1995 to 2000 is incomplete. However, while the number of facilities upon which this data is based varies from year to year, we have no reason to believe that this variation in the number of facilities introduces any significant bias to the overall trends that emerge.

### **IV. Hours provided by SNSA’s and SNSA costs**

Data is provided for the eight year period from 1994 thru 2001, the latest year for which this data is available. Showing for each of the three geographic areas, three positions are considered—RN, LPN and CNA. This data was available for Rule 50 facilities only until 2001. In that year the data was also collected for contracted facilities.

Pool usage per 100,000 total hours increased markedly in 2001 in all geographic groups for all three positions reported (Table 7). Before 2001 there is quite a bit of variation in pool usage from position to position and especially from area to area. Statewide hours being provided by SNSA's increased over the years while total hours worked decreased. The reduction in total hours worked is primarily caused by bed reductions and the closure of nursing facilities.

## **V. Comparing Pool Costs with Employee Costs**

Comparisons of the cost per hour of pool workers and nursing home employees are provided in Table 6.

The graphs for the costs per hour in the rural group show some zero costs for pool workers in years before 2000 because no pool workers were reported in this geographic area for these positions. Hourly costs for pools rose faster than did employee costs. In seven out of these nine sets of data the greatest differential between pool costs and employee costs appears in 2000 and 2001.

## **VI. Conclusions**

The data reveal that, through 2001, the rates charged by SNSAs are growing much more rapidly than the wages of nursing home employees, and the proportion of hours worked by pool workers is growing as well.

## **Attachment A**

Geographic group one is the rural group consisting of Beltrami, Big Stone, Cass, Chippewa, Clearwater, Cottonwood, Crow Wing, Hubbard, Jackson, Kandiyohi, Lac Qui Parle, Lake of the Woods, Lincoln, Lyon, Mahnomen, Meeker, Morrison, Murray, Nobles, Pipestone, Redwood, Renville, Rock, Swift, Todd, Yellow Medicine, and Wadena counties.

Geographic group two is the semi-rural group consisting of Becker, Benton, Blue Earth, Brown, Chisago, Clay, Dodge, Douglas, Faribault, Fillmore, Freeborn, Goodhue, Grant, Houston, Isanti, Kanabec, Kittson, LeSueur, McLeod, Marshall, Martin, Mille Lacs, Mower, Nicollet, Norman, Olmsted, Otter Tail, Pennington, Pine, Polk, Pope, Red Lake, Rice, Roseau, Sherburne, Sibley, Stearns, Steele, Stevens, Traverse, Wabasha, Waseca, Watonwan, Wilkin, Winona, and Wright counties.

Geographic group three is the metro group consisting of Aitkin, Anoka, Carlton, Carver, Cook, Dakota, Hennepin, Itasca, Koochiching, Lake, Ramsey, Saint Louis, Scott, and Washington counties.

**Table 1****Weighted Average Wage Rates in Minnesota Nursing Facilities**

Sorted by Rule 50 Geographic Groups

Based on Data from Reporting Year Ending 9/30/00

**Weighted Average Wage Rates**

Geographic Employee Class	Group One (83 facilities)	Group Two (175 facilities)	Group Three (163 facilities)
Registered Nurse	\$18.24	\$18.67	\$20.87
LPN	\$12.89	\$13.38	\$15.91
Nursing Aides (CNA)	\$9.15	\$10.17	\$11.38

**Allowable Maximum Supplemental Nursing Service Charge (150%)**

Geographic Employee Class	Group One (83 facilities)	Group Two (175 facilities)	Group Three (163 facilities)
Registered Nurse	\$27.36	\$28.01	\$31.31
LPN	\$19.34	\$20.07	\$23.87
Nursing Aides (CNA)	\$13.73	\$15.26	\$17.07



**Weighted Average Wage Rates in Minnesota Nursing Facilities**  
 Sorted by Rule 50 Geographic Groups  
 Based on Data from Reporting Year Ending 9/30/00

**Weighted Average Wage Rates**

Geographic Employee Class	Group One (83 facilities)	Group Two (175 facilities)	Group Three (163 facilities)
Registered Nurse	\$19.89	\$20.36	\$22.71
LPN	\$14.13	\$14.55	\$17.37
Nursing Aides (CNA)	\$10.02	\$11.11	\$12.41

**Allowable Maximum Supplemental Nursing Service Charge (150%)**

Geographic Employee Class	Group One (83 facilities)	Group Two (175 facilities)	Group Three (163 facilities)
Registered Nurse	\$29.84	\$30.54	\$34.07
LPN	\$21.20	\$21.83	\$26.06
Nursing Aides (CNA)	\$15.03	\$16.67	\$18.62

**Weighted Average<sup>2</sup> Wage Rates in Minnesota Nursing Facilities**  
 Sorted by Rule 50 Geographic Groups  
 Based on Data from Reporting Year Ending 9/30/00

**Weighted Average Wage Rates**

Geographic Employee Group Class	Group One (83 facilities)	Group Two (175 facilities)	Group Three (163 facilities)
Registered Nurse	\$19.78	\$20.41	\$22.79
LPN	\$14.17	\$14.48	\$17.45
Nursing Aides (CNA)	\$9.91	\$10.69	\$12.34

**Allowable Maximum Supplemental Nursing Service Charge (150%)**

Geographic Employee Group Class	Group One (83 facilities)	Group Two (175 facilities)	Group Three (163 facilities)
Registered Nurse	\$29.67	\$30.61	\$34.19
LPN	\$21.26	\$21.71	\$26.17
Nursing Aides (CNA)	\$14.86	\$16.04	\$18.51

---

<sup>2</sup> Weighted by the number of employees in each job classification.

**Weighted Average<sup>3</sup> Wage Rates in Minnesota Nursing Facilities**  
 Sorted by Rule 50 Geographic Groups  
 Based on Each NF's Last Payroll Period in August 2001

**Weighted Average Wage Rates**

Geographic Employee Class	Group One (76 facilities)	Group Two (168 facilities)	Group Three (161 facilities)
Registered Nurse	\$19.42	\$21.86	\$23.49
LPN	\$14.11	\$14.62	\$18.23
Nursing Aides (CNA)	\$9.75	\$10.35	\$12.52
Trained Medication Aide (TMA)	\$10.50	\$11.18	\$14.14

**Allowable Maximum Supplemental Nursing Service Charge (150%)**

Geographic Employee Class	Group One (76 facilities)	Group Two (168 facilities)	Group Three (161 facilities)
Registered Nurse	\$29.13	\$32.79	\$35.24
LPN	\$21.17	\$21.93	\$27.35
Nursing Aides (CNA)	\$14.63	\$15.53	\$18.78
Trained Medication Aide (TMA)	\$15.75	\$16.77	\$21.21

---

<sup>3</sup> Weighted by the number of employees in each job classification.

**Weighted Average Holiday<sup>4</sup> Wage Rates in Minnesota Nursing Facilities**  
 Sorted by Rule 50 Geographic Groups  
 Based on Each NF's Last Payroll Period in August 2001

**Weighted Average Holiday Wage Rates**

Geographic Employee Class	Group One (76 facilities)	Group Two (168 facilities)	Group Three (161 facilities)
Registered Nurse	\$32.04	\$38.91	\$43.69
LPN	\$22.86	\$25.73	\$34.09
Nursing Aides (CNA)	\$15.99	\$18.01	\$23.54
Trained Medication Aide (TMA)	\$17.96	\$19.57	\$27.15

**Allowable Maximum Supplemental Nursing Service Holiday Charge (150%)**

Geographic Employee Class	Group One (76 facilities)	Group Two (168 facilities)	Group Three (161 facilities)
Registered Nurse	\$48.06	\$58.37	\$65.54
LPN	\$34.29	\$38.60	\$51.14
Nursing Aides (CNA)	\$23.99	\$27.01	\$35.31
Trained Medication Aide (TMA)	\$26.93	\$29.35	\$40.72

---

<sup>4</sup> Days to which these rates apply are based on when the nursing facility pays higher rates to its employees for working recognized holidays.

**Weighted Average<sup>5</sup> Wage Rates in Minnesota Nursing Facilities**  
 Sorted by Rule 50 Geographic Groups  
 Annual Increase Effective July 1, 2002

**Weighted Average Wage and Payroll Tax Rates**

Geographic Employee Class	Group One (76 facilities)	Group Two (168 facilities)	Group Three (161 facilities)
Registered Nurse	\$22.45	\$23.47	\$26.24
LPN	\$16.10	\$16.96	\$20.68
Nursing Aides (CNA)	\$11.20	\$12.07	\$14.52
Trained Medication Aide (TMA)	\$11.84	\$13.09	\$16.47

**Allowable Maximum Supplemental Nursing Service Charge (150%)**

Geographic Employee Class	Group One (76 facilities)	Group Two (168 facilities)	Group Three (161 facilities)
Registered Nurse	\$33.68	\$35.21	\$39.36
LPN	\$24.15	\$25.44	\$31.02
Nursing Aides (CNA)	\$16.80	\$18.11	\$21.78
Trained Medication Aide (TMA)	\$17.76	\$19.64	\$24.71

---

<sup>5</sup> Weighted by the number of employees in each job classification.

**Weighted Average Holiday<sup>6</sup> Wage Rates in Minnesota Nursing Facilities**  
 Sorted by Rule 50 Geographic Groups  
 Annual Increase Effective July 1, 2002

**Weighted Average Wage and Payroll Tax Rates**

Geographic Employee Class	Group One (76 facilities)	Group Two (168 facilities)	Group Three (161 facilities)
Registered Nurse	\$37.04	\$41.78	\$48.81
LPN	\$26.08	\$29.85	\$38.67
Nursing Aides (CNA)	\$18.37	\$21.00	\$27.30
Trained Medication Aide (TMA)	\$20.25	\$22.91	\$31.62

**Allowable Maximum Supplemental Nursing Service Holiday Charge (150%)**

Geographic Employee Class	Group One (76 facilities)	Group Two (168 facilities)	Group Three (161 facilities)
Registered Nurse	\$55.56	\$62.67	\$73.22
LPN	\$39.12	\$44.78	\$58.01
Nursing Aides (CNA)	\$27.56	\$31.50	\$40.95
Trained Medication Aide (TMA)	\$30.38	\$34.37	\$47.43

The counties in each of the three geographic groups is the same as the non-holiday pay scale.

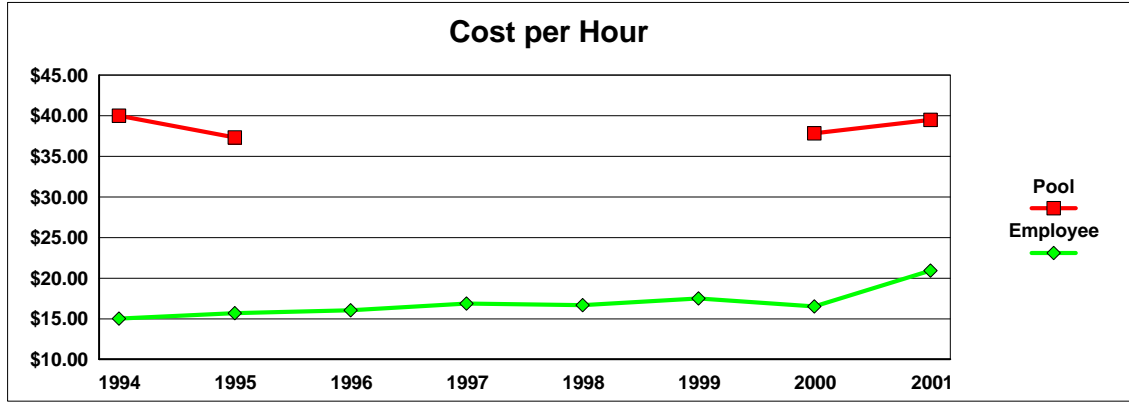
---

<sup>6</sup> Days to which these rates apply are based on when the nursing facility pays higher rates to its employees for working recognized holidays.

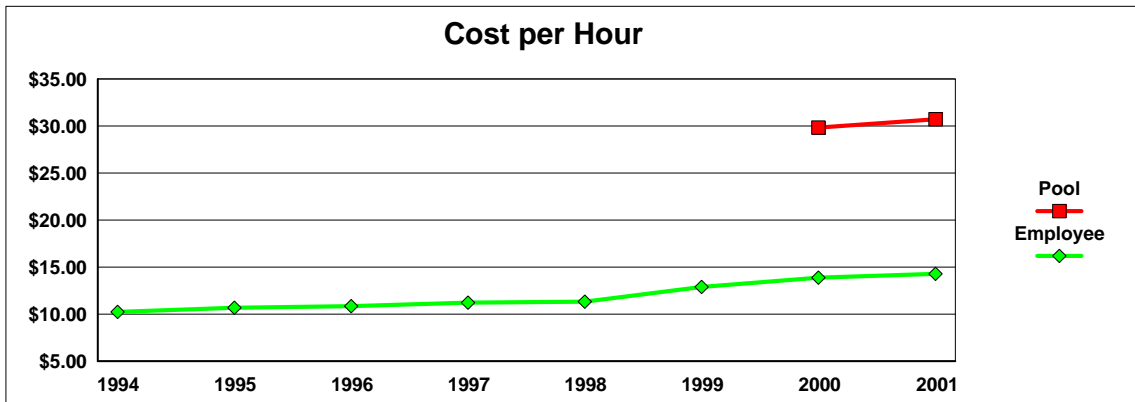
**Rural (group one) Facilities**

	1994	1995	1996	1997	1998	1999	2000	2001
Number of Facilities Reporting	58	56	51	43	23	17	14	69

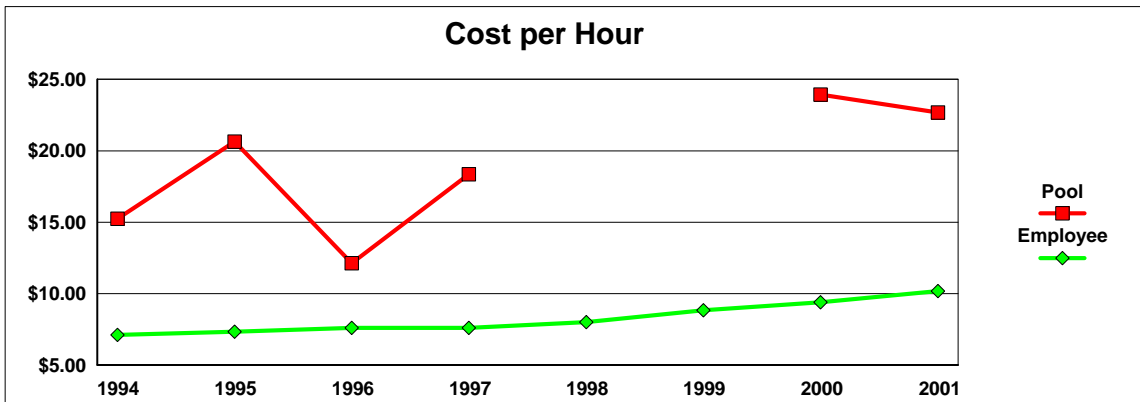
RNs	Pool costs per hour	\$40.00	\$37.33				\$37.86	\$39.50	
	Employee salary costs per hour	\$15.02	\$15.68	\$16.05	\$16.86	\$16.68	\$17.49	\$16.52	\$20.92



LPNs	Pool costs per hour						\$29.85	\$30.72	
	Employee salary costs per hour	\$10.25	\$10.71	\$10.88	\$11.24	\$11.36	\$12.91	\$13.88	\$14.29



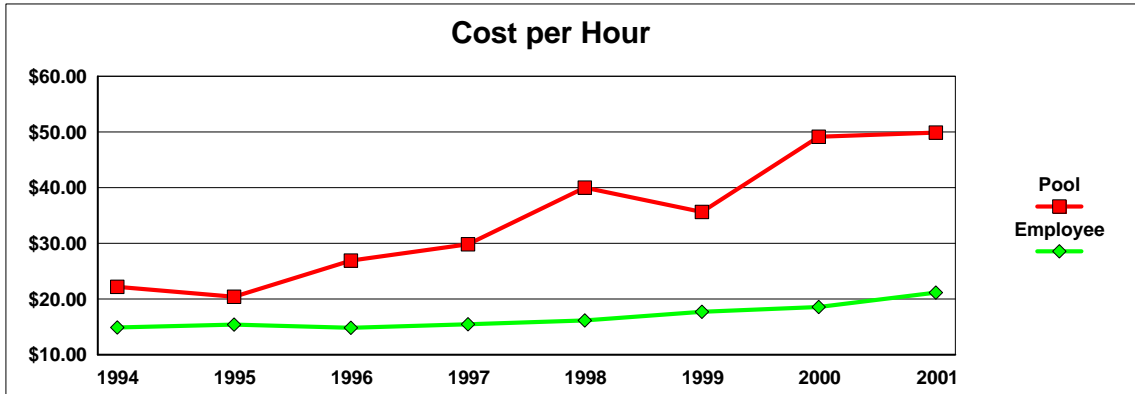
CNAs	Pool costs per hour	\$15.25	\$20.65	\$12.13	\$18.36		\$23.93	\$22.68	
	Employee salary costs per hour	\$7.12	\$7.33	\$7.61	\$7.62	\$8.01	\$8.83	\$9.39	\$10.19



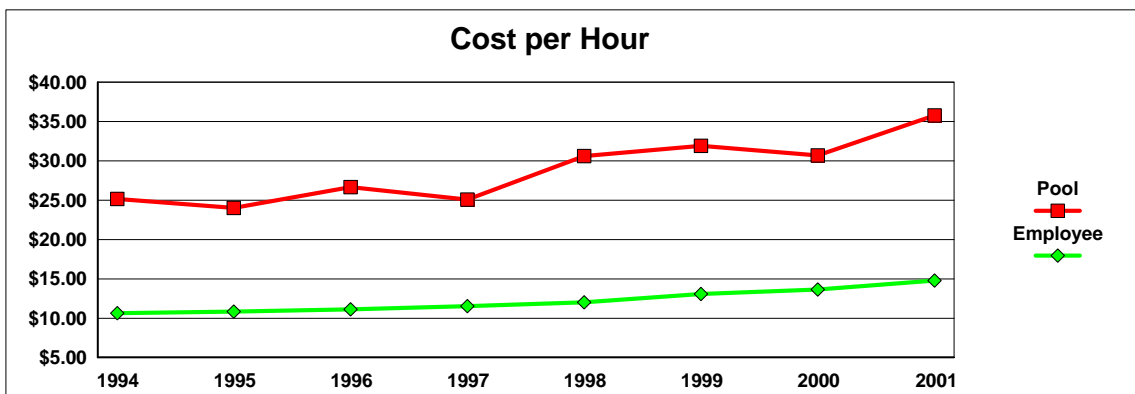
Semi-rural (group two) Facilities

Table 6 (continued)

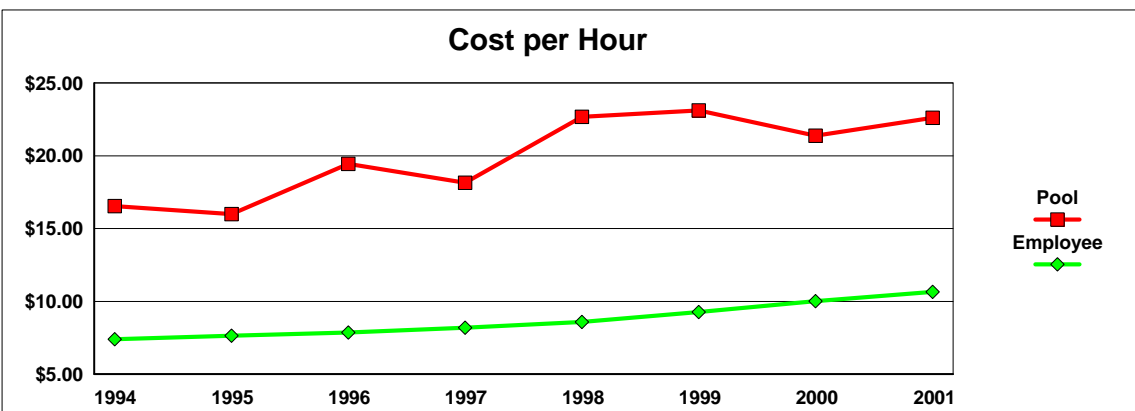
	1994	1995	1996	1997	1998	1999	2000	2001
Number of Facilities Reporting	138	129	101	83	55	47	42	140
RNs Pool costs per hour	\$22.19	\$20.44	\$26.93	\$29.88	\$40.04	\$35.68	\$49.19	\$49.91
Employee salary costs per hour	\$14.90	\$15.43	\$14.83	\$15.46	\$16.16	\$17.74	\$18.62	\$21.15



LPNs Pool costs per hour	\$25.18	\$24.03	\$26.68	\$25.07	\$30.60	\$31.92	\$30.70	\$35.77
Employee salary costs per hour	\$10.64	\$10.83	\$11.12	\$11.54	\$12.01	\$13.07	\$13.66	\$14.78



CNAs Pool costs per hour	\$16.56	\$15.99	\$19.44	\$18.15	\$22.69	\$23.13	\$21.39	\$22.62
Employee salary costs per hour	\$7.40	\$7.64	\$7.87	\$8.20	\$8.60	\$9.28	\$10.03	\$10.65

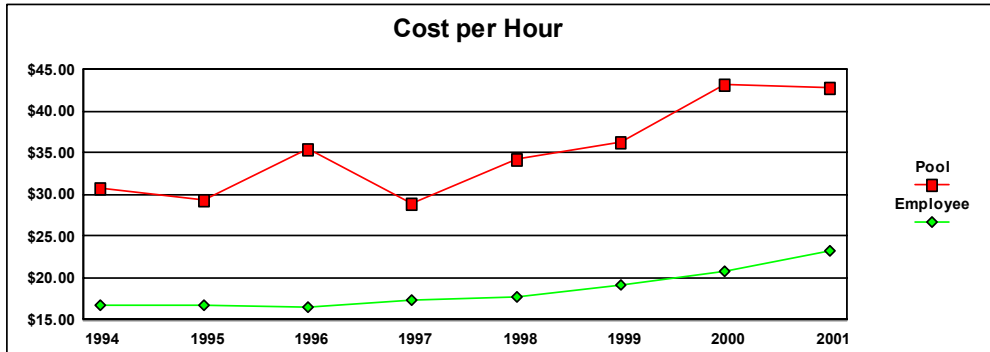




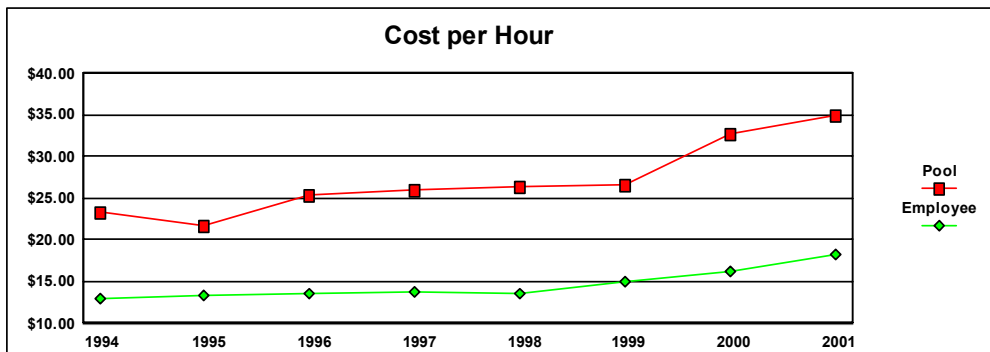
Metro (group three) Facilities

Table 6 (continued)

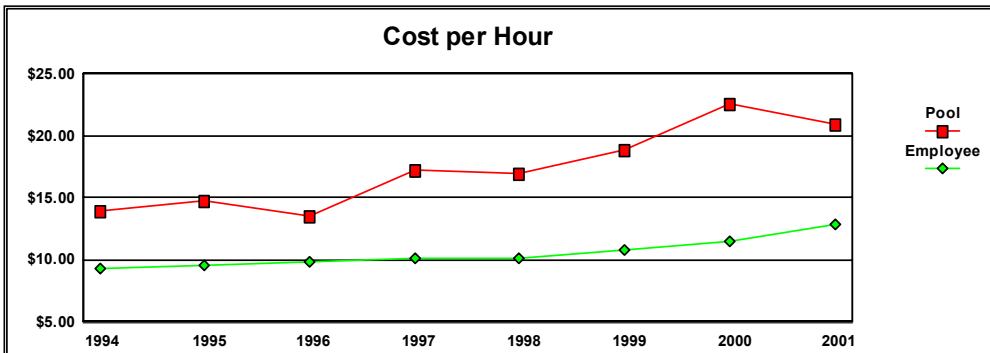
	1994	1995	1996	1997	1998	1999	2000	2001
Number of Facilities Reporting	159	138	111	94	42	34	30	142
RNs Pool costs per hour	30.9	29.45	35.61	28.93	34.21	36.41	43.2	42.82
Employee salary costs per hour	16.8	16.7	16.48	17.34	17.72	19.12	20.77	23.33



LPNs Pool costs per hour	23.34	21.78	25.46	25.93	26.38	26.71	32.85	34.93
Employee salary costs per hour	12.86	13.3	13.5	13.82	13.5	15.06	16.17	18.28



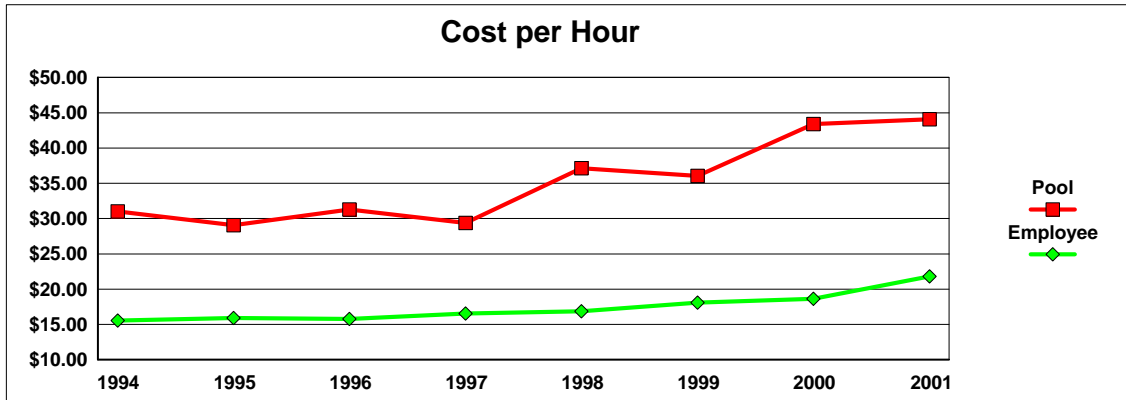
CNAs Pool costs per hour	13.95	14.79	13.55	17.21	16.96	18.97	22.57	20.92
Employee salary costs per hour	9.29	9.59	9.92	10.11	10.07	10.88	11.56	12.84



All Facilities (statewide)

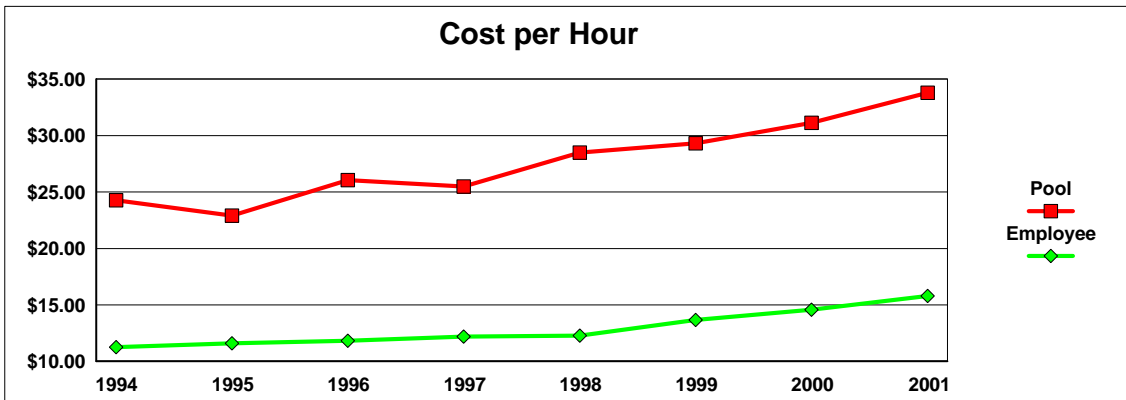
Table 6 (continued)

	1994	1995	1996	1997	1998	1999	2000	2001
Number of Facilities Reporting	355	323	263	220	120	98	86	351
RNs Pool costs per hour	\$31.03	\$29.07	\$31.27	\$29.41	\$37.13	\$36.05	\$43.42	\$44.08
Employee salary costs per hour	\$15.57	\$15.94	\$15.79	\$16.55	\$16.85	\$18.12	\$18.64	\$21.80



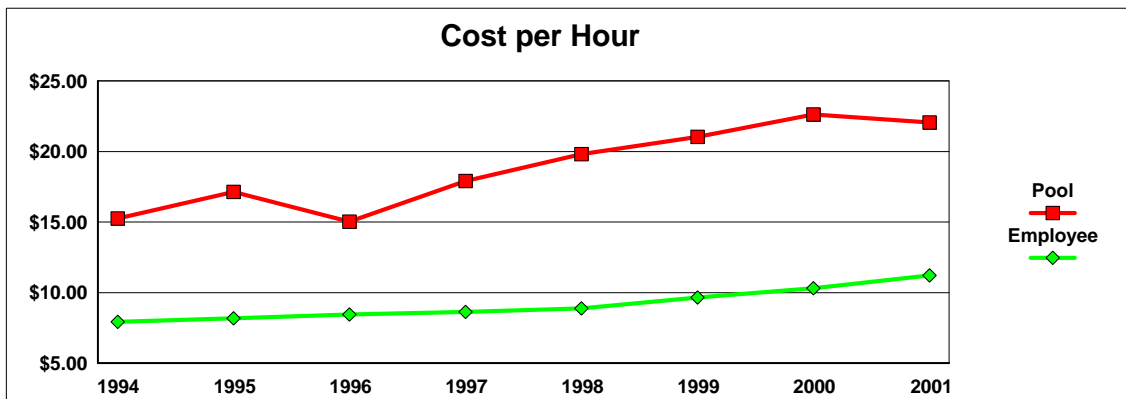
LPNs

Pool costs per hour	\$24.26	\$22.91	\$26.07	\$25.50	\$28.49	\$29.32	\$31.13	\$33.81
Employee salary costs per hour	\$11.25	\$11.61	\$11.83	\$12.20	\$12.29	\$13.68	\$14.57	\$15.78



CNAs

Pool costs per hour	\$15.25	\$17.14	\$15.04	\$17.91	\$19.83	\$21.05	\$22.63	\$22.07
Employee salary costs per hour	\$7.94	\$8.19	\$8.47	\$8.64	\$8.89	\$9.66	\$10.33	\$11.23

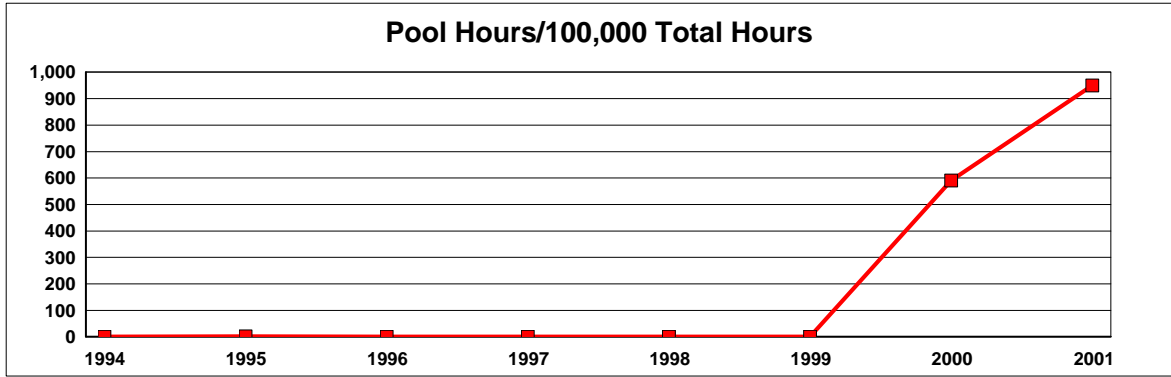


Pool Hours Compared to Total Hours

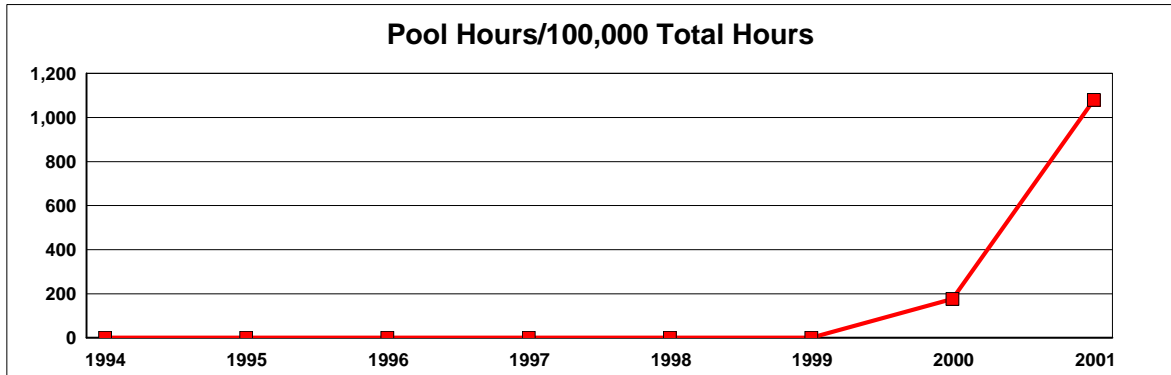
Table 7

Rural (group one) Facilities

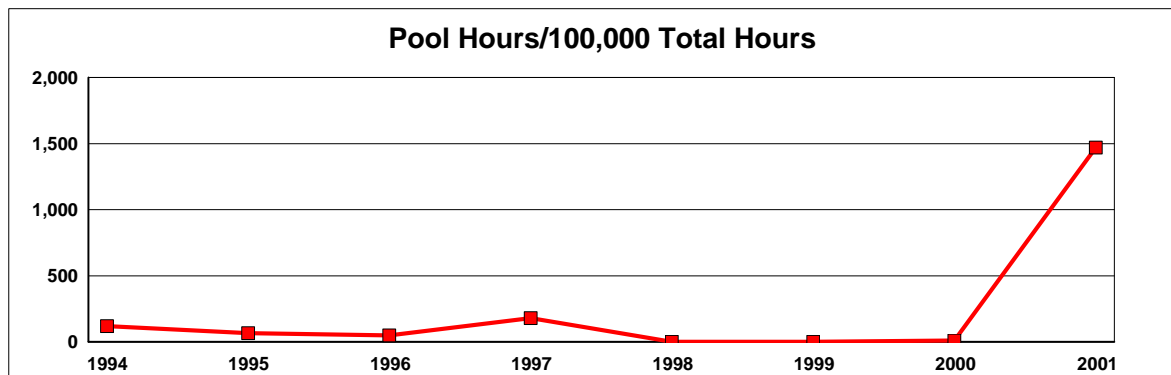
	<u>1994</u>	<u>1995</u>	<u>1996</u>	<u>1997</u>	<u>1998</u>	<u>1999</u>	<u>2000</u>	<u>2001</u>
Number of Facilities Reporting	58	56	51	43	23	17	14	69
Pool RN Hours	5	6	0	0	0	0	502	6,214
Total RN Hours	472,371	450,496	406,413	320,778	143,796	95,179	85,042	654,479
Pool RN Hours/100,000 Total Hrs	1	1	0	0	0	0	590	949



Pool LPN Hours	0	0	0	0	0	0	351	13,542
Total LPN Hours	1,041,601	1,042,687	967,122	773,154	348,186	244,003	198,471	1,252,919
Pool LPN Hours/100,000 Total Hrs	0	0	0	0	0	0	177	1,081



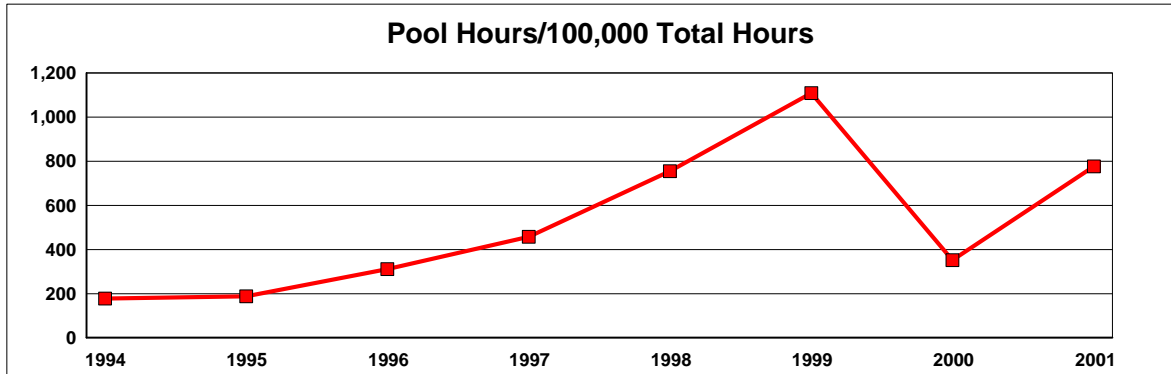
Pool CNA Hours	4,342	2,295	1,449	4,215	0	0	60	55,437
Total CNA Hours	3,637,057	3,468,560	2,924,785	2,343,810	1,097,036	684,962	582,076	3,766,102
Pool CNA Hours/100,000 Total Hrs	119	66	50	180	0	0	10	1,472



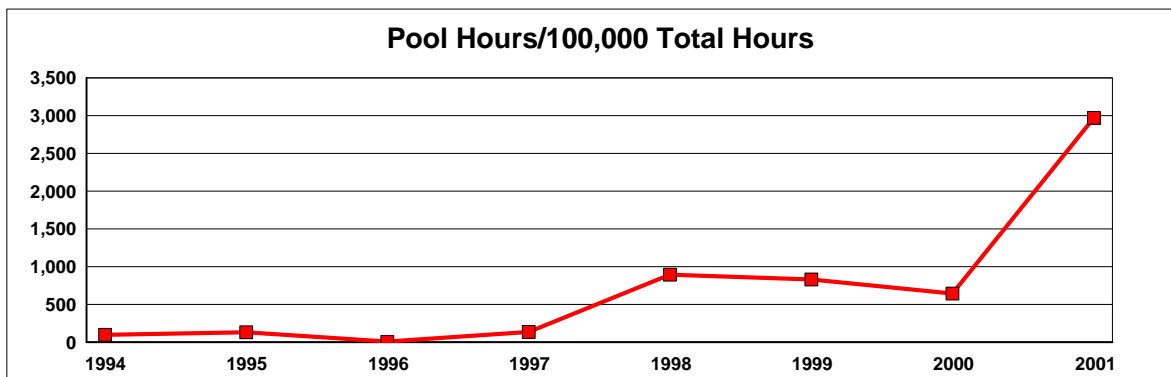
Semi-rural (group two) Facilities

Table 7 (continued)

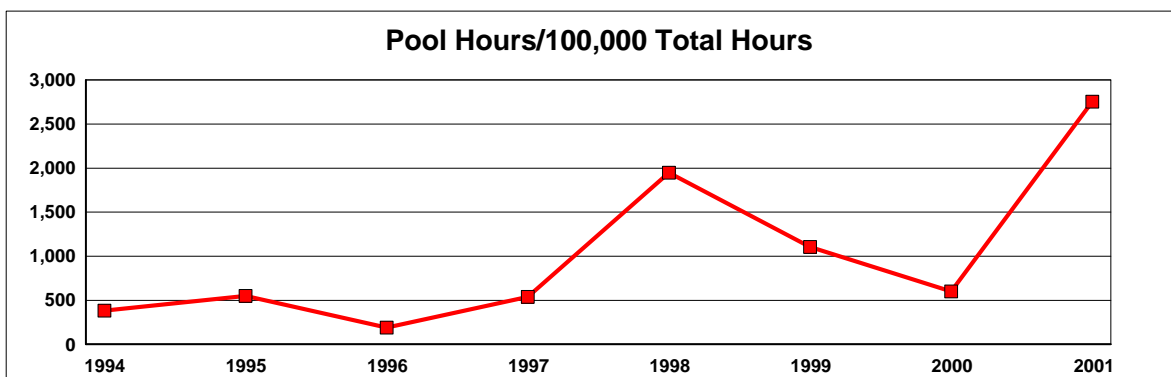
	<u>1994</u>	<u>1995</u>	<u>1996</u>	<u>1997</u>	<u>1998</u>	<u>1999</u>	<u>2000</u>	<u>2001</u>
Number of Facilities Reporting	138	129	101	83	55	47	42	140
Pool RN Hours	2,531	2,685	3,437	4,318	4,879	5,480	1,428	12,850
Total RN Hours	1,423,417	1,427,491	1,102,353	943,568	646,207	493,741	405,963	1,654,596
Pool RN Hours/100,000 Total Hrs	178	188	312	458	755	1,110	352	777



Pool LPN Hours	2,981	3,975	273	2,592	11,152	8,906	6,050	93,107
Total LPN Hours	3,048,373	2,947,579	2,263,962	1,866,278	1,246,535	1,071,687	938,478	3,131,153
Pool LPN Hours/100,000 Total Hrs	98	135	12	139	895	831	645	2,974



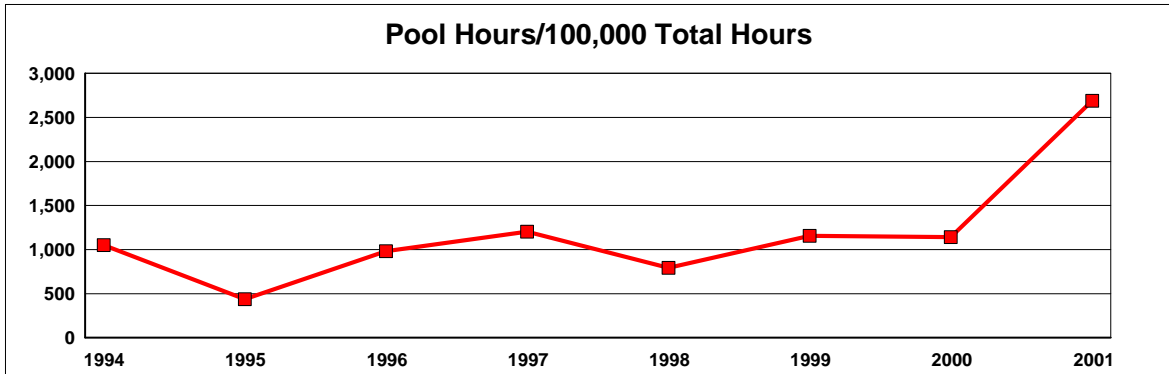
Pool CNA Hours	38,667	51,061	12,569	29,145	71,910	33,933	15,033	238,822
Total CNA Hours	10,043,870	9,289,306	6,540,809	5,397,390	3,691,218	3,066,063	2,504,530	8,673,820
Pool CNA Hours/100,000 Total Hrs	385	550	192	540	1,948	1,107	600	2,753



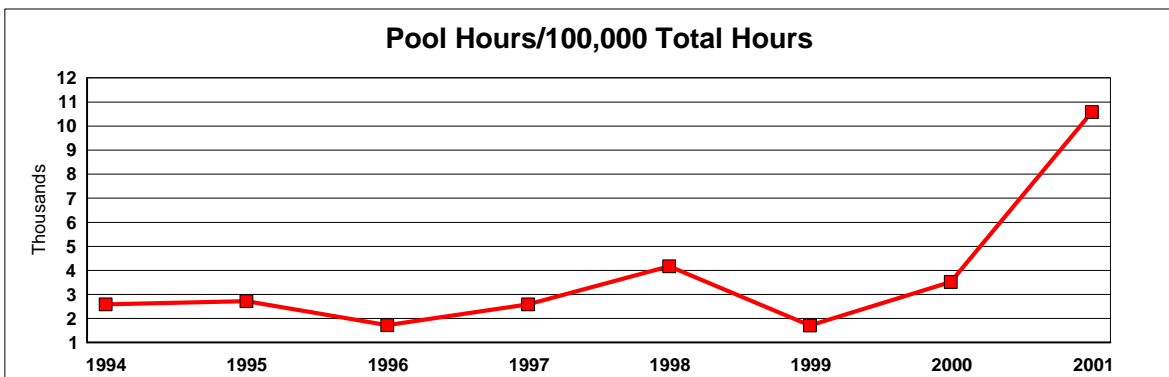
Metro (group three) Facilities

Table 7 (continued)

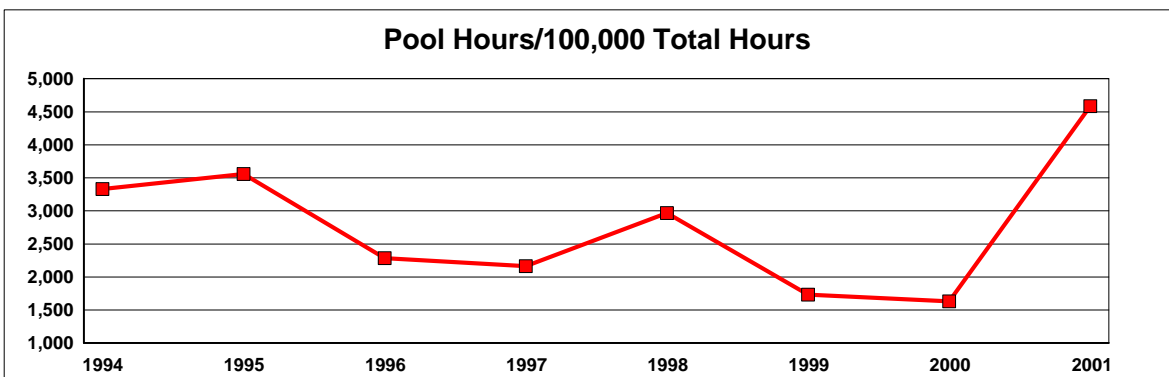
	<u>1994</u>	<u>1995</u>	<u>1996</u>	<u>1997</u>	<u>1998</u>	<u>1999</u>	<u>2000</u>	<u>2001</u>
Number of Facilities Reporting	159	138	111	94	42	34	30	142
Pool RN Hours	40,060	14,924	24,799	23,264	5,321	5,308	4,113	74,453
Total RN Hours	3,808,834	3,399,505	2,520,526	1,931,957	669,199	458,976	360,620	2,769,966
Pool RN Hours/100,000 Total Hrs	1,052	439	984	1,204	795	1,156	1,141	2,688



Pool LPN Hours	106,755	92,523	44,827	53,016	36,100	11,487	20,719	439,251
Total LPN Hours	4,118,507	3,393,971	2,593,473	2,050,154	864,069	672,627	587,976	4,151,485
Pool LPN Hours/100,000 Total Hrs	2,592	2,726	1,728	2,586	4,178	1,708	3,524	10,581



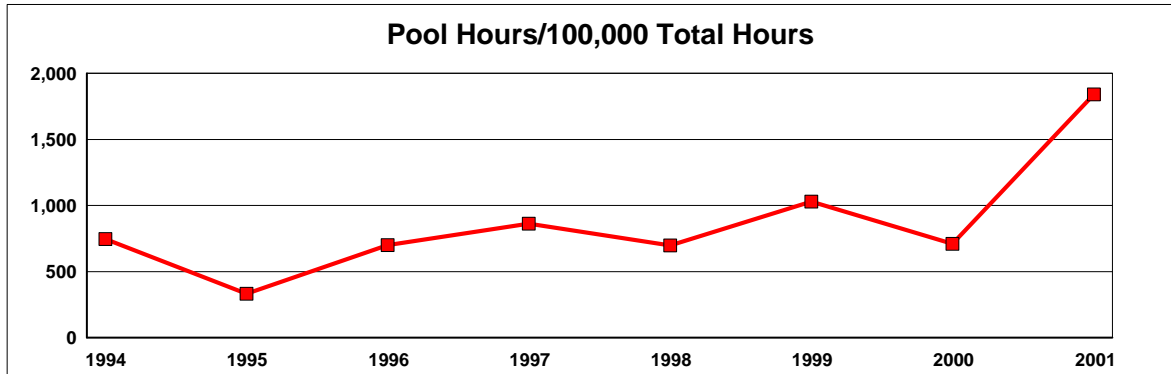
Pool CNA Hours	517,781	442,606	202,745	151,989	78,075	34,014	26,358	571,479
Total CNA Hours	15,536,725	12,437,068	8,866,649	7,020,302	2,631,643	1,963,422	1,614,247	12,455,191
Pool CNA Hours/100,000 Total Hrs	3,333	3,559	2,287	2,165	2,967	1,732	1,633	4,588



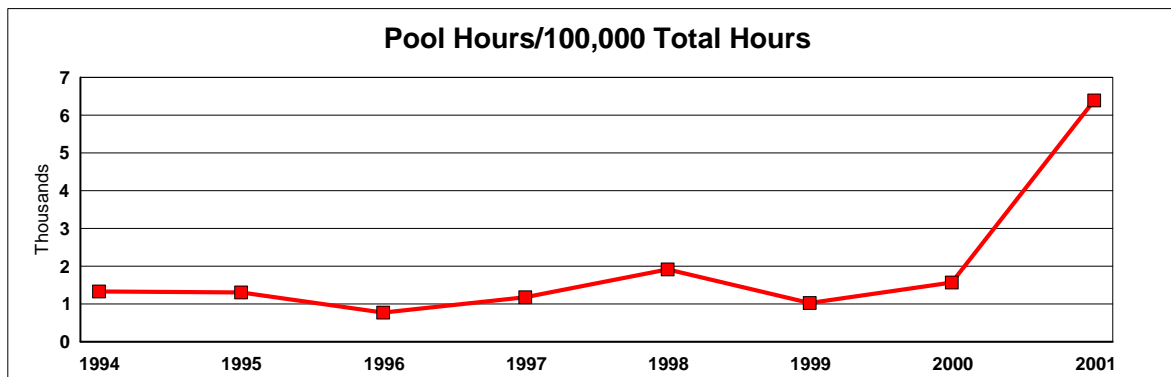
All Facilities (statewide)

Table 7 (continued)

	<u>1994</u>	<u>1995</u>	<u>1996</u>	<u>1997</u>	<u>1998</u>	<u>1999</u>	<u>2000</u>	<u>2001</u>
Number of Facilities Reporting	355	323	263	220	120	98	86	351
Pool RN Hours	42,596	17,615	28,236	27,582	10,200	10,788	6,043	93,517
Total RN Hours	5,704,622	5,277,492	4,029,292	3,196,303	1,459,202	1,047,896	851,625	5,079,041
Pool RN Hours/100,000 Total Hrs	747	334	701	863	699	1,029	710	1,841



Pool LPN Hours	109,736	96,498	45,100	55,608	47,252	20,393	27,120	545,900
Total LPN Hours	8,208,481	7,384,237	5,824,557	4,689,586	2,458,790	1,988,317	1,724,925	8,535,557
Pool LPN Hours/100,000 Total Hrs	1,337	1,307	774	1,186	1,922	1,026	1,572	6,396



Pool CNA Hours	560,790	495,962	216,763	185,349	149,985	67,947	41,451	865,738
Total CNA Hours	29,217,652	25,194,934	18,332,243	14,761,502	7,419,897	5,714,447	4,700,853	24,895,113
Pool CNA Hours/100,000 Total Hrs	1,919	1,968	1,182	1,256	2,021	1,189	882	3,478

