



**State of Louisiana**  
Louisiana Department of Health  
Office of the Secretary

April 8, 2026

**Via Statutorily Prescribed Email**

**To:** The Honorable Patrick McMath, Chairman, Senate Health & Welfare Committee  
The Honorable Dustin Miller, Chairman, House Health & Welfare Committee

**From:** Bruce D. Greenstein  
Secretary

A handwritten signature in blue ink, appearing to be "BW", written over a circular stamp.

**Re:** Second Report to Proposed Amendments to LAC 48:I.Chapter 77 – Nurse Staffing Agencies – Licensing Standards

Pursuant to the Louisiana Administrative Procedure Act, the Louisiana Department of Health, Health Standards Section, submits its second report regarding the Nurse Staffing Agencies – Licensing Standards, LAC 48:I.Chapter 77.

A Notice of Intent on the proposed amendments was published in the June 20, 2025 issue of the *Louisiana Register* (LR 51:888). Written comments were received, which the Department reviewed and determined substantive revisions were needed to the published Notice of Intent. An Item of Potpourri was published in the September 20, 2025 issue of the *Louisiana Register* (LR 51:1530) announcing a public hearing on the substantive revisions. A public hearing was held on October 28, 2025, with only LDH employees in attendance. An Item of Potpourri was published in the December 20, 2025 issue of the *Louisiana Register* (LR 51:2177) announcing a public hearing on the substantive revisions per comments received from the September 20, 2025 Item of Potpourri. A public hearing was held on March 3, 2026, with only LDH employees in attendance.

Unless otherwise directed, the Department anticipates adopting the June 20, 2025 Notice of Intent, with substantive changes of the Potpourris included, when it is published as a final rule in the May 20, 2026 issue of the *Louisiana Register*.

Please contact Cynthia York, [Cynthia.York@la.gov](mailto:Cynthia.York@la.gov) if you have any questions or require additional information about this matter.

**Cc:** Cecile Castello, Interim HSS Deputy Assistant Secretary, LDH  
Kimberly Humbles, General Counsel, LDH  
Bethany Blackson, Chief of Staff, LDH  
Andrea Trantham, Editor, *Louisiana Administrative Code*, Office of the State Register

**NOTICE OF INTENT**

**Department of Health  
Health Standards Section**

**Nurse Staffing Agencies—Licensing Standards  
(LAC 48:I.Chapter 77)**

The Department of Health, Health Standards Section (the department), proposes to amend LAC 48:I.Chapter 77 as authorized by R.S. 36:254. This proposed Rule is promulgated in accordance with the provisions of the Administrative Procedure Act, R.S. 49:950 et seq.

The department proposes to amend the provisions governing the licensing of nurse staffing agencies in order to add and update definitions, adjust social media policy requirements, revise administrator requirements, and modify initial licensure, renewal of licensure, and change of ownership requirements.

**Title 48**

**PUBLIC HEALTH—GENERAL**

**Part I. General Administration**

**Subpart 3. Licensing and Certification**

**Chapter 77. Nurse Staffing Agencies Licensing  
Standards**

**Subchapter A. General Provisions**

**§7701. Introduction**

A. ...

B. Any person, partnership, corporation, unincorporated association, or other legal entity that meets the definition of an NSA shall submit an initial licensing application and fee to the department within 90 days of the promulgation of the initial rules, regulations, and licensing standards.

B.1. - G2. ...

**AUTHORITY NOTE:** Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1728 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

**§7703. Definitions**

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*Certified Nurse Aide (CNA)*—an individual who has completed a Nurse Aide Training and Competency Evaluation Program approved by the state as meeting the requirements of 42 CFR 483.151 and 483.154, or has been determined competent as provided in 42 CFR 483.150(a) and (b) and is listed as certified and in good standing on the state's certified nurse aide registry. For purposes of this licensing rule, a CNA who is engaged through a licensed NSA may be considered an independent contractor, provided that such CNA in his or her sole discretion bids on open shifts and chooses where, when, and how often to work.

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*Client*—the licensed healthcare facility to which the registered nurse, licensed practical nurse, or certified nurse aide is assigned.

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*Employee or Contracted Staff*—a person employed or engaged as an independent contractor by the nurse staffing agency (NSA) to perform healthcare services in a healthcare facility.

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*Healthcare Technology Platform or Platform*—any person, partnership, corporation, unincorporated association or other legal entity that develops and operates, offers, or maintains a system or technology that provides an internet-based or application-based marketplace through which an independent nurse or certified nurse aide bids on open shifts posted by a healthcare facility to provide services for the healthcare facility.

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*Licensed Practical Nurse (LPN)*—a person who practices practical nursing and who is licensed to practice practical nursing in accordance with R.S. 38:961, or current law. For purposes of this licensing rule, an LPN who is engaged through a licensed NSA may be considered an independent contractor, provided that such LPN in his or her sole discretion bids on open shifts and chooses where, when, and how often to work.

*Line of Credit*—a credit arrangement with a federally insured, licensed lending institution that is established to ensure that the NSA has available funds as needed to continue the operations of the NSA. The line of credit shall be issued to the licensed entity. For purposes of NSA licensure, the line of credit shall not be a loan, credit card, or a bank balance.

*Louisiana Adverse Actions List*—the adverse actions database, or its successor, maintained by the department or its designee, containing all individuals or providers who are sanctioned, which may include exclusions or for-cause terminations through LDH.

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*Nurse*—a registered nurse as defined in R.S. 37:913, or current law, or a licensed practical nurse as defined in R.S. 37:961, or current law. For purposes of this licensing rule, a nurse who is engaged through a licensed NSA may be considered an independent contractor, provided that such

nurse in his or her sole discretion bids on open shifts and chooses where, when, and how often to work.

*Nurse Staffing Agency (NSA)*—any person, partnership, corporation, unincorporated association, or other legal entity, including a healthcare technology platform, that employs, contracts with, assigns, or refers nurses or CNAs to render healthcare services in a healthcare facility for a fee. For purposes of these regulations, NSA does not include the following:

1. - 3. ...

4. A recruitment organization engaged by a healthcare facility to identify foreign educated nurses or CNAs for direct employment by the healthcare facility.

*Referral*—the act of sending or directing, or facilitating the sending or directing, the registered nurse, licensed practical nurse, or CNA to a healthcare facility to provide healthcare services at the request of or for the benefit of the healthcare facility.

\*\*\*

*Registered Nurse (RN)*—any individual licensed in accordance with R.S. 37:911 et seq., or current law, to engage in the practice of nursing as defined in R.S. 37:913, or current law. For purposes of this licensing rule, a registered nurse who is engaged through a licensed NSA may be considered an independent contractor, provided that such registered nurse in his or her sole discretion bids on open shifts and chooses where, when, and how often to work.

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AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1729 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

**§7705. Licensure Requirements**

A. - E. ...

F. The NSA shall maintain evidence of the following:

1. current professional liability insurance in an amount sufficient to provide coverage in accordance with the total amount recoverable for all malpractice claims as indicated in R.S. 40:1231.2, or current law; and

2. current compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1, et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident insurance, for those independent contractors or other staff not subject to Louisiana Worker's Compensation law.

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1730 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

**§7707. Initial Licensure Application Process**

A. ...

B. The initial licensing application packet shall include:

1. - 5. ...

6. evidence of the following:

a. financial solvency comprised of:

i. a line of credit issued from a federally insured, licensed lending institution in the amount of at least \$25,000; or

ii. verification of sufficient assets equal to \$25,000 or the cost of three months of operation, whichever is less;

b. professional liability insurance in an amount sufficient to provide coverage in accordance with the total amount recoverable for all malpractice claims as indicated in R.S. 40:1231.2, or current law; and

c. compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1 et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident insurance, for those independent contractors or other staff not subject to Louisiana Worker's Compensation law;

7. ...

8. a completed disclosure of ownership and control information form; and

9. any other relevant documentation or information required by the department for licensure;

10. - 11. Repealed.

C. If the initial licensing application packet is incomplete, the applicant shall be notified of the missing information and shall have 90 days from receipt of the notification to submit the additional requested information.

1. If the additional requested information is not submitted to the department within 90 days, the application shall be closed.

2. If an initial licensing application is closed, an applicant who is still interested in becoming a NSA shall submit a new initial licensing packet with a new initial nonrefundable licensing fee to start the initial licensing process.

3. - 8. Repealed.

D. Once the initial licensing application packet has been approved by the department, the NSA applicant shall submit to the department a verified readiness attestation that the NSA is in compliance with the NSA licensing laws, regulations, and standards. However, the department retains the discretion to conduct an on-site survey or inspection.

1. If an applicant fails to submit the required readiness attestation for initial licensure within 90 days of approval, the initial licensing application shall be closed. After an initial licensing application is closed, an applicant who is still interested in becoming a NSA must submit a new initial licensing packet with a new initial non-refundable licensing fee to start the initial licensing process.

2. Repealed.

E. Applicant shall be in compliance with all federal, state, departmental, or local statutes, laws, ordinances, rules, and regulations, and all non-refundable fees shall be paid before the NSA provider will be issued an initial license to operate.

1. The secretary of the department may, within his/her sole discretion, grant waivers to provisions of the NSA licensing rules. The NSA shall submit a waiver request in writing to the department on forms prescribed by the department.

2. In the waiver request, the NSA shall demonstrate the following:

a. how the health, safety, and welfare of an individual or individuals receiving services will not be compromised if such waiver is granted;

b. how the quality of care offered will not be compromised if such waiver is granted; and

c. all other requirements of the service, condition, or regulation.

3. The licensing section of the department shall have each waiver request reviewed by an internal waiver review committee. In conducting such internal waiver review, the following shall apply:

a. the waiver review committee may consult subject matter experts as necessary; and

b. the waiver review committee may require the NSA to submit risk assessments or other documentation to the department.

4. The director of the licensing section of the department shall submit the waiver review committee's recommendation on each waiver to the secretary, or the secretary's designee, for final determination.

5. The department shall issue a written decision of the waiver request to the NSA. The granting of any waiver may be for a specific length of time.

6. The written decision of the waiver request is final. There is no right to an appeal of the decision of the waiver request.

7. If any waiver is granted, it is not transferrable in an ownership change or change of location.

8. Waivers are subject to review and revocation upon any change of circumstance related to the waiver or upon a finding that the health, safety, or welfare of an individual or individuals may be compromised.

F. Repealed.

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1730 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

#### **§7709. Initial Licensing Reviews or Surveys**

A. Prior to the initial license being issued to the NSA, an initial licensing review or survey shall be conducted to ensure compliance with the NSA licensing laws and standards. Except for existing NSAs who timely apply for a license under §7701 of this Chapter, no NSA services shall be provided by the NSA until the NSA has been found in compliance, and the initial license has been issued to the NSA by the department. An existing NSA that timely applies for a license must receive a license within 180 days in order to continue to provide services.

B. In the event that the initial licensing review or survey finds that the NSA is compliant with all licensing laws, regulations, and any other required statutes, laws, ordinances, rules, regulations, and non-refundable fees, the department shall issue a full license to the provider. The license shall be valid until the expiration date shown on the license, unless the license is revoked.

C. In the event that the initial licensing review or survey finds that the NSA is noncompliant with any licensing laws, regulations, or any other required statutes, laws, ordinances, rules or regulations that present a potential threat to the health, safety, or welfare of an individual or individuals receiving services, the department shall deny the initial license.

D. In the event that the initial licensing review or survey finds that the NSA is deficient or noncompliant with any licensing laws, regulations, or any other required statutes, laws, ordinances, rules or regulations, but the department in its sole discretion determines that the deficiency or noncompliance does not present a threat to the health, safety, or welfare of an individual or individuals receiving services, the department may issue a provisional initial license for a period not to exceed six months.

1. The provider shall submit an acceptable plan of correction to the department for approval, and the NSA shall be required to correct all such deficiencies or noncompliance(s) prior to the expiration of the provisional license.

a. If all such deficiencies or noncompliance(s) are corrected on the follow-up licensing review or survey, a full license will be issued.

b. If all such deficiencies or noncompliance(s) are not corrected on the follow-up licensing review or survey, or new deficiencies or noncompliance(s) affecting the health, safety, or welfare of an individual or individuals receiving services is cited, the provisional license shall expire and the provider shall be required to begin the initial licensing process again by submitting a new initial license application packet and the appropriate non-refundable licensing fee.

E. An initial licensing review or survey of a NSA shall be an announced survey. Follow-up licensing reviews or surveys to the initial licensing surveys shall be unannounced surveys.

F. Once a NSA has been issued an initial license, the department may conduct licensing reviews and other surveys at intervals deemed necessary by the department to determine compliance with licensing standards and regulations, as well as other required statutes, laws, ordinances, rules, regulations, and fees.

1. A plan of correction may be required from an NSA where deficiencies or noncompliance(s) have been cited. Such plan of correction shall be approved by the department.

2. A follow-up licensing review or survey may be conducted for any licensing review or survey where deficiencies or noncompliance(s) have been cited to ensure correction of the noncompliant or deficient practice(s).

G. The department's surveyors and staff shall be given access to all areas of the NSA and all relevant files during any licensing review, survey, or complaint investigation, and shall be allowed to interview any NSA staff as necessary to conduct the complaint investigation.

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1731 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

#### **§7711. Types of Licenses and Expiration Dates**

A. The department shall have the authority to issue the following types of licenses:

1. Full Initial License. The department shall issue a full license to the NSA when the initial licensing review or survey finds that the NSA is compliant with all licensing laws and regulations, and is compliant with all other required statutes, laws, ordinances, rules, regulations, and all non-refundable fees have been paid. The license shall be

valid until the expiration date shown on the license, unless the license is revoked.

2. Provisional Initial License. The department may issue a provisional initial license to the NSA when the initial licensing review or survey finds that the NSA is deficient or noncompliant with any licensing laws or regulations or any other required statutes, laws, ordinances, rules, regulations or non-refundable fees, but the department determines that the deficiencies or noncompliance(s) do not present a threat to the health, safety, or welfare of an individual or individuals receiving services.

3. ...

4. Provisional Renewal License. The department, in its sole discretion, may issue a provisional license to an existing licensed NSA for a period not to exceed six months.

a. The department will consider the following circumstances in making a determination to issue a provisional license:

i. - iv. ...

v. the existing NSA has failed to correct deficiencies or noncompliant practice(s) within 60 days of being cited for such deficiencies or noncompliant practice(s) or at the time of a follow-up review or survey; or

vi. ...

b. When the department issues a provisional license to an existing licensed NSA, the NSA shall submit a plan of correction to LDH for approval, and the NSA shall be required to correct all such deficiencies or noncompliant practice(s) prior to the expiration of the provisional license. The department shall conduct a follow-up review or survey of the NSA prior to the expiration of the provisional license.

i. If the follow-up review or survey determines that the NSA has corrected the deficiencies or noncompliant practice(s) and has maintained compliance during the period of the provisional license, the department may issue a full license until the anniversary date of the NSA license.

ii. If the follow-up review or survey determines that all deficiencies or noncompliance(s) have not been corrected, or if new deficiencies or noncompliance(s) that are a threat to the health, safety, or welfare of an individual or individuals receiving services are cited on the follow-up review or survey, the provisional license shall expire. The NSA shall be required to begin the initial licensing process again by submitting a new initial license application packet and appropriate nonrefundable fee.

iii. The department shall issue written notice to the NSA of the results of the follow-up review or survey.

B. - C. ...

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1732 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

#### **§7715. Change of Ownership of a Nurse Staffing Agency Provider**

A. ...

B. Before a license can be issued to the new owner, the new owner shall meet all licensing application requirements. The new owner shall submit to the department for approval, a change of ownership (CHOW) application packet that includes:

1. - 5.

6. evidence of the following:

a. financial solvency comprised of:

i. a line of credit issued from a federally insured, licensed lending institution in the amount of at least \$25,000; or

ii. verification of sufficient assets equal to \$25,000 or the cost of three months of operation, whichever is less;

b. current professional liability insurance in an amount sufficient to provide coverage in accordance with the total amount recoverable for all malpractice claims as indicated in R.S. 40:1231.2, or current law; and

c. current compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1 et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident insurance, for those independent contractors or other staff not subject to Louisiana Worker's Compensation Law;

7. ...

8. a completed disclosure of ownership and control information form;

9. any other relevant documentation or information required by the department for licensure.

10. Repealed.

C. - F. ...

G. Once all application requirements have been completed and approved by the department, a new license shall be issued to the new owner. The transferor shall remain responsible for the operation of the NSA until such time as a license is issued to the transferee.

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1733 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

#### **§7717. Renewal of License**

A. The NSA shall submit a completed license renewal application packet to the department at least 30 days prior to the expiration of the current license. The completed license renewal application packet shall include:

1. ...

2. evidence of the following:

a. financial solvency comprised of:

i. a line of credit issued from a federally insured, licensed lending institution in the amount of \$25,000; or

ii. verification of sufficient assets equal to \$25,000 or the cost of three months of operation, whichever is less;

b. evidence of current professional liability insurance in an amount sufficient to provide coverage in accordance with the total amount recoverable for all malpractice claims as indicated in R.S. 40:1231.2, or current law; and

c. evidence of current compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1 et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident insurance, for those independent contractors or other staff not subject to Louisiana Worker's Compensation law;

A.3. - C.1. ...

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1734 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

#### **§7719. Denial of Initial Licensure, Revocation of License, Denial of License Renewal, Operation without License and Penalty**

A. - E. ...

F. Operation without License and Penalty

1. An NSA shall not operate without a license issued by the department.

a. Any such person, partnership, corporation, unincorporated associations, or other legal entity operating a NSA without a license shall be guilty of a misdemeanor and upon conviction shall be fined no less than \$250 for each day of operation without a license, up to a maximum of \$1,000. Each day of violation shall constitute a separate offense.

1.b. - 2.a. ...

3. The department shall seek an injunction in the Nineteenth Judicial District Court against any person, partnership, corporation, unincorporated associations, or other legal entity operating an NSA that receives a cease and desist order from the department and who does not cease operations immediately.

a. Any such person, partnership, corporation, unincorporated association, or other legal entity operating an NSA against whom an injunction is granted shall be liable to the department for attorney fees, costs, and damages.

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1734 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

#### **Subchapter B. Administration and Organization**

##### **§7735. Governing Body**

A. An NSA shall have an identifiable governing body with responsibility for and authority over the policies and activities of the NSA.

A.1. - B.11. ...

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1738 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

##### **§7737. Policy and Procedures**

A. The NSA shall develop, implement, and comply with NSA-specific written policies and procedures, approved by the owner(s) or governing body, related to compliance with this Chapter, including but not limited to the following policies and procedures:

1. - 13. ...

14. a written policy to address prohibited use of social media. The policy shall ensure that all employees or contracted staff, at a minimum, ensure preservation of dignity, respect, and confidentiality of an individual or individuals' receipt of healthcare services, and protection of an individual or individuals receiving healthcare services' privacy and personal and property rights.

B. ...

**AUTHORITY NOTE:** Promulgated in accordance with R.S. 36:254.

**HISTORICAL NOTE:** Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1739 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

**§7741. Branch Offices and Satellites of Nurse Staffing Agency Providers**

A. Nurse staffing agency providers with branch offices or satellite locations shall meet the following:

1. No branch office or satellite location may be opened without prior written approval from HSS. In order for a branch office or satellite location to be approved, the parent NSA shall have maintained a full licensure for the previous 12-month period.

2. The department may consider the following in making a determination whether to approve a branch office or a satellite location:

a. - c. ...

d. if the parent NSA currently has a provisional license;

e. if the parent NSA currently is in a settlement agreement with the department;

f. if the parent NSA is currently under license revocation or denial of license renewal;

g. if the parent NSA is currently undergoing a change of ownership; and

h. if any adverse action has been taken against the license of other NSAs operated by the owner of the parent NSA within the previous two-year period.

3. The branch office or satellite location shall be held out to the public as a branch office or satellite of the parent NSA so that the public will be aware of the identity of the NSA operating the branch office or satellite.

3.a. - 8. ...

**AUTHORITY NOTE:** Promulgated in accordance with R.S. 36:254.

**HISTORICAL NOTE:** Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1739 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

**Subchapter C. Provider Responsibilities**

**§7751. Core Staffing Requirements**

A. - B.

C. The NSA shall not employ, assign, or refer for use in a healthcare facility in Louisiana, a nurse or CNA unless the nurse or CNA is certified or licensed in accordance with the applicable provision of state and federal laws or regulations, and meets the minimum mandatory qualifications and requirements for CNAs. Each nurse and CNA shall comply with all pertinent regulations of the department relating to the health and other qualifications of employees or contracted staff employed in healthcare facilities.

1. The NSA shall review the Louisiana certified nurse aide registry (LCNAR), the Louisiana adverse actions list, and the Office of Inspector General's list of excluded individuals and entities (OIG-LEIE), to confirm that there has been no finding that any nurse or CNA has committed exploitation, extortion, abuse, neglect, or misappropriation of property or funds of an individual in the care of the nurse or CNA, prior to hire or contract and monthly thereafter. If such a finding exists, the NSA shall not employ, assign, or

refer the nurse or CNA, and existing employments, assignments, or referrals shall be terminated.

2. The NSA shall provide the healthcare facility, of which the nurse or CNA is assigned or referred, with documentation verifying the certification or licensure status of a nurse or CNA, as well as the certification and minimum mandatory qualifications for CNAs, in accordance with the applicable provision of state and federal laws or regulations.

D. Administrator/Director Responsibilities. The administrator/director shall:

1. ...

2. be available in person or by telecommunication at all times for all aspects of NSA operation or designate in writing an individual to assume the authority and control of the NSA if the administrator/director is temporarily unavailable;

3. be responsible for the day-to-day management and supervision of the operations of the NSA;

4. - 7. ...

8. implement an ongoing, accurate, and effective budgeting and accounting system; and

9. ensure that all employees or contracted staff receive proper orientation and training on policies and procedures, as required by law or as necessary to fulfill each employee or contracted staff person's responsibilities.

10. Repealed.

E. - E.3. ...

**AUTHORITY NOTE:** Promulgated in accordance with R.S. 36:254.

**HISTORICAL NOTE:** Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1740 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

**§7753. Record Keeping**

A. - A.10. ...

B. Personnel Records. An NSA shall maintain a personnel record for each employee or contracted staff. At a minimum, this file shall contain the following:

1. - 3. ...

4. evidence of reviews of the LCNAR, the Louisiana adverse actions list, and the Office of Inspector General's list of excluded individuals and entities (OIG-LEIE), to confirm that there has been no finding that any CNA has committed exploitation, extortion, abuse, neglect, or misappropriation of property or funds of an individual in the care of the CNA, prior to hire or contract and monthly thereafter. If such a finding exists, the NSA shall not employ, assign, or refer the CNA, and existing employments, assignments, or referrals shall be terminated.

B.5. - C.2.d. ...

**AUTHORITY NOTE:** Promulgated in accordance with R.S. 36:254.

**HISTORICAL NOTE:** Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1740 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

**Family Impact Statement**

In compliance with Act 1183 of the 1999 Regular Session of the Louisiana Legislature, the impact of this proposed Rule on the family has been considered. It is anticipated that this proposed Rule will have no impact on family functioning, stability and autonomy as described in R.S. 49:972.

### Poverty Impact Statement

In compliance with Act 854 of the 2012 Regular Session of the Louisiana Legislature, the poverty impact of this proposed Rule has been considered. It is anticipated that this proposed Rule will have no impact on child, individual, or family poverty in relation to individual or community asset development as described in R.S. 49:973.

### Small Business Analysis

In compliance with the Small Business Protection Act, the economic impact of this proposed Rule on small businesses has been considered. It is anticipated that this proposed Rule may result in an indeterminable decrease in costs to small business providers in FY 25-26, FY 26-27, and FY 27-28, since criminal background checks on all applicant(s), owner(s) with five percent or more ownership interest, or administrator(s)/director(s) for any state lived in within the last five years will no longer be required for initial licensure as a NSA or change of ownership of a NSA.

### Provider Impact Statement

In compliance with House Concurrent Resolution (HCR) 170 of the 2014 Regular Session of the Louisiana Legislature, the provider impact of this proposed Rule has been considered. It is anticipated that this proposed Rule will have no impact on the staffing level requirements or qualifications required to provide the same level of service and no impact on the provider's ability to provide the same level of service as described in HCR 170. It is anticipated that this proposed Rule may result in an indeterminable decrease in costs to a NSA in FY 25-26, FY 26-27, and FY 27-28 since criminal background checks on all applicant(s), owner(s) with five percent or more ownership interest, or administrator(s)/director(s) for any state lived in within the last five years will no longer be required for initial licensure as a NSA or change of ownership of a NSA.

### Public Comments

Interested persons may submit written comments to Tasheka Dukes, RN, Health Standards Section, P.O. Box 3767, Baton Rouge, LA 70821. Ms. Dukes is responsible for responding to inquiries regarding this proposed Rule. The deadline for submitting written comments is at 4:30 p.m. on August 4, 2025.

### Public Hearing

Interested persons may submit a written request to conduct a public hearing by U.S. mail to the Office of the Secretary ATTN: LDH Rulemaking Coordinator, Post Office Box 629, Baton Rouge, LA 70821-0629; however, such request must be received no later than 4:30 p.m. on July 14, 2025. If the criteria set forth in R.S. 49:961(B)(1) are satisfied, LDH will conduct a public hearing at 9:30 a.m. on July 29, 2025 in Room 118 of the Bienville Building, which is located at 628 North Fourth Street, Baton Rouge, LA. To confirm whether or not a public hearing will be held, interested persons should first call Allen Enger at (225) 342-1342 after July 14, 2025. If a public hearing is to be held, all interested persons are invited to attend and present data, views, comments, or arguments, orally or in writing.

Bruce D. Greenstein  
Secretary

## FISCAL AND ECONOMIC IMPACT STATEMENT FOR ADMINISTRATIVE RULES RULE TITLE: Nurse Staffing Agencies Licensing Standards

### I. ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENT UNITS (Summary)

It is anticipated that implementation of this proposed Rule will have no programmatic fiscal impact to the state or local governmental units other than the cost of promulgation in FY 26. It is anticipated that \$2,700 will be expended in FY 26 for the state's administrative expense for promulgation of this proposed Rule and the final Rule.

This proposed Rule amends the provisions governing the licensing of nurse staffing agencies (NSA) in order to add and update definitions, adjust social media policy requirements, revise administrator requirements, and modify initial licensure, renewal of licensure, and change of ownership requirements.

### II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS (Summary)

It is anticipated that implementation of this proposed Rule will have no impact on state or local revenue collections. This is a licensing Rule that does not add any licensing fees.

### III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS, SMALL BUSINESSES, OR NONGOVERNMENTAL GROUPS (Summary)

It is anticipated that implementation of this proposed Rule may result in an indeterminable cost savings to providers, as criminal background checks will no longer be required for initial licensure or change of ownership of an NSA for all applicants, owners with five percent or more ownership interest, or administrators/directors for any state of residence in within the past five years.

### IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)

It is anticipated that this proposed Rule will have no effect on the staffing level requirements or qualifications required to provide the same level of service.

Tasheka Dukes, RN  
Deputy Assistant Secretary  
2506#057

Patrice Thomas  
Deputy Fiscal Officer  
Legislative Fiscal Office

**POTPOURRI**

**Department of Health  
Health Standards Section**

**Notice of Public Hearing  
Substantive Changes to Proposed Rule  
Nurse Staffing Agencies—Licensing Standards  
(LAC 48:I.Chapter 77)**

In accordance with the provisions of the Administrative Procedure Act, R.S. 49:950 et seq., the Department of Health, Health Standards Section (the department), published a Notice of Intent in the June 20, 2025 edition of the *Louisiana Register* (LR 51:888-894) to amend LAC 48:I.Chapter 77, as authorized by R.S. 36:254. This Notice of Intent proposed to amend the provisions governing the licensing of nurse staffing agencies in order to add and update definitions, adjust social media policy requirements, revise administrator qualifications, and modify initial licensure, renewal of licensure, and change of ownership requirements.

As a result of comments received in response to the proposed Rule, the department determined that additional, non-technical revisions were necessary to the provisions of the June 20, 2025 Notice of Intent. A Potpourri was published in the September 20, 2025 edition of the *Louisiana Register* (LR 51:1530-1532) to amend LAC 48:I.Chapter 77 as authorized by R.S. 36:254. This Potpourri proposed to amend definitions, licensure requirements, and the process for license application and license renewal.

As a result of comments received in response to the proposed Rule, the department determined that additional, non-technical revisions were necessary to the provisions of the June 20, 2025 Notice of Intent and the September 20, 2025 Potpourri.

Taken together, these revisions will closely align the proposed Rule with the department's original intent and the concerns brought forth during the comment period for the Notice of Intent and the Potpourri as originally published.

The proposed Rule text below has been drafted utilizing plain language principles to ensure clarity and accessibility for all users. It has also been reviewed and tested for compliance with web accessibility standards.

**Title 48**

**PUBLIC HEALTH—GENERAL**

**Part I. General Administration**

**Subpart 3. Licensing and Certification**

**Chapter 77. Nurse Staffing Agencies Licensing Standards**

**Subchapter A. General Provisions**

**§7703. Definitions**

**\*\*\***

*Certified Nurse Aide (CNA)*—an individual who has completed a Nurse Aide Training and Competency Evaluation Program approved by the state as meeting the requirements of 42 CFR 483.151 and 483.154, or has been determined competent as provided in 42 CFR 483.150(a) and (b) and is

listed as certified and in good standing on the state's certified nurse aide registry. For purposes of this licensing rule, a CNA who is engaged through a licensed NSA may be considered a contractor, provided that such classification is consistent with state and federal law, and the CNA in his or her sole discretion bids on open shifts and chooses where, when, and how often to work.

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**Employee or Contracted Staff**—a person employed or engaged as a contractor by the nurse staffing agency (NSA) to perform healthcare services in a healthcare facility.

**Healthcare Technology Platform or Platform**—any person, partnership, corporation, unincorporated association or other legal entity that develops and operates, offers, or maintains a system or technology that provides an internet-based or application-based marketplace through which a contracted nurse, who has a current Louisiana license in good standing practicing within the scope of the nursing license, or certified nurse aide bids on, selects, or accepts open shifts posted by a healthcare facility to provide services for the healthcare facility. A NSA operating as a healthcare technology platform shall designate a nurse as a person of contact for all healthcare facilities.

**Licensed Practical Nurse (LPN)**—a person who practices practical nursing and who is licensed to practice practical nursing in accordance with R.S. 38:961, or current law. For purposes of this licensing rule, an LPN who is engaged through a licensed NSA may be considered a contractor, provided that such classification is consistent with state and federal law, and the LPN in his or her sole discretion bids on open shifts and chooses where, when, and how often to work. The LPN shall have a current Louisiana license in good standing, and shall practice within the scope of the LPN license.

**Nurse**—a registered nurse as defined in R.S. 37:913, or current law, or a licensed practical nurse as defined in R.S. 37:961, or current law. For purposes of this licensing rule, a nurse who is engaged through a licensed NSA may be considered a contractor, provided that such classification is consistent with the state and federal law, and the nurse in his or her sole discretion bids on open shifts and chooses where, when, and how often to work. The nurse shall have a current Louisiana license in good standing, and shall practice within the scope of the nursing license.

**Nurse Staffing Agency (NSA)**—any person, partnership, corporation, unincorporated association, or other legal entity, including a healthcare technology platform, that employs, contracts with, assigns, or refers nurses or CNAs to render healthcare services in a healthcare facility for a fee. For purposes of this definition, a fee does not mean damages recovered in a breach of contract matter. For purposes of these regulations, NSA does not include the following:

1. - 4. ...

**Registered Nurse (RN)**—any individual licensed in accordance with R.S. 37:911 et seq., or current law, to engage in the practice of nursing as defined in R.S. 37:913, or current law. For purposes of this licensing rule, an RN who is engaged through a licensed NSA may be considered a contractor, provided that such classification is consistent with the state and federal law, and the RN in his or her sole discretion bids

on open shifts and chooses where, when, and how often to work. The RN shall have a current Louisiana license in good standing, and shall practice within the scope of the RN license.

**AUTHORITY NOTE:** Promulgated in accordance with R.S. 36:254.

**HISTORICAL NOTE:** Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1729 (October 2023), amended by the Department of Health, Health Standards Section, LR 52:

#### §7705. Licensure Requirements

A. - E. ...

F. The NSA shall maintain evidence of the following:

1. ...

2. current compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1, et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident insurance, for those contractors or other staff not subject to Louisiana Worker's Compensation law.

**AUTHORITY NOTE:** Promulgated in accordance with R.S. 36:254.

**HISTORICAL NOTE:** Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1730 (October 2023), amended by the Department of Health, Health Standards Section, LR 52:

#### §7707. Initial Licensure Application Process

A. ...

B. The initial licensing application packet shall include:

1. - 5. ...

6. evidence of the following:

a. - b. ...

c. compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1 et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident insurance, for those contractors or other staff not subject to Louisiana Worker's Compensation law;

7. - 9. ...

10. - 11. Repealed.

C. - F. ...

**AUTHORITY NOTE:** Promulgated in accordance with R.S. 36:254.

**HISTORICAL NOTE:** Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1730 (October 2023), amended by the Department of Health, Health Standards Section, LR 52:

#### §7715. Change of Ownership of a Nurse Staffing Agency Provider

A. ...

B. Before a license can be issued to the new owner, the new owner shall meet all licensing application requirements. The new owner shall submit to the department for approval, a change of ownership (CHOW) application packet that includes:

1. - 5. ...

6. evidence of the following:

a. - b. ...

c. current compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1 et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident insurance,

for those contractors or other staff not subject to Louisiana Worker's Compensation Law;

B. 7.- G. . . .

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1733 (October 2023), amended by the Department of Health, Health Standards Section, LR 52:

**§7717. Renewal of License**

A. The NSA shall submit a completed license renewal application packet to the department at least 30 days prior to the expiration of the current license. The completed license renewal application packet shall include:

1.

2. evidence of the following:

a. - b.

c. evidence of current compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1 et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident insurance, for those contractors or other staff not subject to Louisiana Worker's Compensation law;

A.3. - C.1. . . .

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1734 (October 2023), amended by the Department of Health, Health Standards Section, LR 52:

Interested persons may submit written comments to Cecile Castello, RN, Health Standards Section, P.O. Box 3767, Baton Rouge, LA 70821. Ms. Castello is responsible for responding to inquiries regarding this proposed Rule. A public hearing on the substantive changes to the proposed Rule is scheduled for March 3, 2026 at 9:30 a.m. in Room 118, Bienville Building, 628 North Fourth Street, Baton Rouge, LA. At that time all interested persons will be afforded an opportunity to submit data, views, or arguments either orally or in writing. The deadline for receipt of all written comments is March 4, 2026 at 4:30 p.m.

Bruce D. Greenstein  
Secretary

2601#041

**POTPOURRI**

**Department of Health  
Health Standards Section**

Notice of Public Hearing  
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**Title 48**

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**Subchapter A. General Provisions**

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\* \* \*

**Employee or Contracted Staff**—a person employed or engaged as a contractor by the nurse staffing agency (NSA) to perform healthcare services in a healthcare facility.

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*Nurse*—a registered nurse as defined in R.S. 37:913, or current law, or a licensed practical nurse as defined in R.S. 37:961, or current law. For purposes of this licensing rule, a nurse who is engaged through a licensed NSA may be considered a contractor provided that such nurse, who has a current Louisiana license in good standing practicing within the scope of the nursing license, in his or her sole discretion bids on open shifts and chooses where, when, and how often to work.

*Nurse Staffing Agency (NSA)*—any person, partnership, corporation, unincorporated association, or other legal entity, including a healthcare technology platform, that employs, contracts with, assigns, or refers nurses or CNAs to render healthcare services in a healthcare facility for a fee. For purposes of this definition, a fee does not mean damages recovered in a breach of contract matter. For purposes of these regulations, NSA does not include the following:

1. - 4. ...

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AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1729 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

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A. - E. ...

F. The NSA shall maintain evidence of the following:

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2. current compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1, et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident

insurance, for those contractors or other staff not subject to Louisiana Worker's Compensation law.

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1730 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

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A. ...

B. The initial licensing application packet shall include:

1. - 5. ...

6. evidence of the

following: a. - b. ...

c. compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1 et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident insurance, for those contractors or other staff not subject to Louisiana Worker's Compensation law;

7. - 9. ...

10. - 11. Repealed.

C. - F. ...

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A. ...

B. Before a license can be issued to the new owner, the new owner shall meet all licensing application requirements. The new owner shall submit to the department for approval, a change of ownership (CHOW) application packet that includes:

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6. evidence of the

following: a. - b. ...

c. current compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1 et seq., or current law, with a minimum coverage in the amount of \$1,000,000, or equivalent coverage, such as occupational accident insurance, for those contractors or other staff not subject to Louisiana Worker's Compensation Law;

B.7. - G. ...

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

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A. The NSA shall submit a completed license renewal application packet to the department at least 30 days prior to the expiration of the current license. The completed license renewal application packet shall include:

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2. evidence of the

following: a. - b. ...

c. evidence of current compliance with the Louisiana Workers' Compensation Law, R.S. 23:1020.1 et seq., or current law, with a minimum coverage in the amount

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A.3. - C.1. ...

AUTHORITY NOTE: Promulgated in accordance with R.S. 36:254.

HISTORICAL NOTE: Promulgated by the Department of Health, Bureau of Health Services Financing, LR 49:1734 (October 2023), amended by the Department of Health, Health Standards Section, LR 51:

**Public Comments**

Interested persons may submit written comments to Tasheka Dukes, RN, Health Standards Section, P.O. Box 3767, Baton Rouge, LA 70821. Ms. Dukes is responsible for responding to inquiries regarding this proposed Rule.

**Public Hearing**

A public hearing on the substantive changes to the proposed Rule is scheduled for October 28, 2025 at 9:30 a.m. in Room 118, Bienville Building, 628 North Fourth Street, Baton Rouge, LA. At that time all interested persons will be afforded an opportunity to submit data, views, or arguments either orally or in writing. The deadline for receipt of all written comments is October 29, 2025 at 4:30 p.m.

Bruce D. Greenstein  
Secretary

2509#053

**SUMMARY OF PUBLIC COMMENTS**  
**NOI – Nurse Staffing Agencies (LAC 48:I.Chapter 77)**  
**NOI Published June 2025**

Comments Received July 9, 2025
<p><b>Marc Hebert, Esq.</b>                      Jones Walker LLP                      201 St. Charles Ave, Ste 5100                      New Orleans, LA 70170                      joneswalker.com</p> <p>1) Stated an issue exists in that the supervisor or manager is not properly construed when referencing the requirement of a healthcare technology platform, as an NSA, to hire a manager or supervisor that is a nurse to comply with the Act.</p> <p>Proposed addition of the following language: "For purposes of this licensing rule, a Healthcare Technology Platform (HTP) shall be deemed to satisfy the requirements of La. R.S. 40:2120 20(B) if it designates a nurse to manage or supervise the process of verifying the credentials of an independent nurse or certified nurse aide using the platform as an independent contractor</p>
Comments Received August 4, 2025
<p><b>Nursa</b>                      Kerry Brown, General Counsel                      and  <b>KARE</b>                      Rich Kortum, VP of Strategic Partnerships</p> <p>1) Requested further clarity and modifications to the proposed definition and associated requirements of HTPs. Stated HTPs do not provide direct patient care, employ or supervise clinical personnel, or maintain physical operations in Louisiana, and therefore, should not be subjected to the requirement of designating an Administrator/Director.</p> <p>Proposed to amend definition of healthcare technology platform to read as follows: Healthcare Technology Platform or Platform - any person, partnership, corporation, unincorporated association or other legal entity that develops and operates, offers, or maintains a system or technology that provides an internet-based or application-based marketplace through which an independent nurse or certified nurse aide bids on, <u>selects or accepts</u> open shifts posted by a healthcare facility to provide services for the healthcare facility.</p> <p>2) Requested clarification on how Subchapter C, Provider Responsibilities, §7751 Core Staffing Requirements will apply to HTPs. In particular, Section D requires each nurse staffing agency to designate an Administrator/Director. Stated they support strong standards of accountability for licensed NSAs, but the requirement does not reflect the business model or operational structure of HTPs. Healthcare technology platforms do not provide direct patient care, employ or supervise clinical personnel, or maintain physical operations in Louisiana. Rather, they operate as digital marketplaces that facilitate connections between licensed healthcare professionals and facilities, with professionals independently managing their engagements. As such, platforms do not exert control or oversight over the professionals using their tools, and are not structured to fulfill supervisory or facility-based requirements designed for traditional staffing agencies. Imposing the Administrator/Director requirement on such platforms would create a burdensome and impractical compliance obligation that is incompatible with their model. To avoid confusion and over breadth.</p> <p>Proposed that HSS clarify that this provision applies only to NSAs with direct employment or facility-based operations in the state, and not to HTPs that operate solely as intermediaries.</p>

Comments Received August 6, 2025	
<p><b>Flora Pappas</b> 15401 S. 14<sup>th</sup> Place Phoenix, AZ 85048</p>	<p>1) Stated it's illegal to define CNA/Nurse Aides, LPN, and/or RN as independent Contractors, if the LDH makes this amendment. It will break Louisiana Office of State Procurement law, Louisiana Board of Nursing Regulations, Louisiana Procurement Code, United States Department of Labor Laws, and more</p> <p>2) Further stated that RN, LPN, and Nurse Aide scope of practice always requires an individual retain a position as a W2 employee. They cannot make independent decisions and are not qualified to practice without oversight.</p>
Comments Received August 8, 2025	
<p><b>MedPro Healthcare Staffing</b> Leticia Lamarque, Esq. Senior Director of Legal &amp; Compliance 1580 Sawgrass Corporate Parkway, Suite 200 Sunrise, FL 33323</p>	<p>1) Stated that AAIIHR had proposed modifying the definitions under Section 7703 to (1) include a definition for "Temporary Employment and (2) modify the definition of "Employee or Contracted Staff" to clarify that it applies to temporary employment. In lieu of the proposed definition changes we note that NSA NOI 25 06 proposes to exclude recruitment organizations from the definition of a "Nurse Staffing Agency". Specifically, the new proposed rulemaking exclusion reads as follows:  <i>"... For the purposes of these regulations, NSA does not include the following: 4. a recruitment organization engaged by a healthcare facility to identify foreign educated nurses or CNAs for direct employment by the healthcare facility."</i></p> <p>Proposed the following changes:  a. Reinsert reference to "temporary basis" as follows:  <i>"Client – the licensed healthcare facility to which the registered nurse, licensed practical nurse, or certified nurse aid is assigned on a temporary basis."</i></p> <p>b. Add the definition for "Temporary Employment" as previously proposed  <i>"Temporary Employment – a registered nurse, licensed practical nurse, or certified nurse aid placed in a healthcare facility for an initial term of less than 24 continuous months to support or supplement the healthcare facilities' workforce for any purpose."</i></p> <p>c. Modify the definition of "Employee or Contracted Staff" as previously proposed  <i>"Employee or Contracted Staff – a person employed or engaged as an independent contractor for temporary employment by the nurse staffing agency (NSA) to perform healthcare services in a healthcare facility"</i></p>
Comments Received August 22, 2025	
<p><b>Mark Savoie</b> masavoie@mac.com</p>	<p>1) Stated that the Internal Revenue Services and the Department of Labor ruled that nurses and nursing assistants working through Nurse Staffing Agencies are NOT Independent Contractors. If changes in Rule occurs, Nursing Homes and Hospitals would be liable for up to half of back wages, overtime wages, non-withholding of employee taxes, penalties, and interest assessments in addition to violating these workers' right to receive healthcare under the Affordable Care Act due to the fact that these agencies would all fall under the large employer category whereby they are required to offer health insurance if they have 50 FTEs. Nurses, nursing assistants and other health care workers ARE NOT independent contractors.</p>

**SUMMARY OF PUBLIC COMMENTS**

**Potpourri – Nurse Staffing Agencies (LAC 48:I.Chapter 77)**

**Potpourri Published September 2025**

Comments Received October 14, 2025

**Amber Sprengard** - VP of Government Affairs & External Relations - [Amber.sprengard@healthcounsel.com](mailto:Amber.sprengard@healthcounsel.com)

1) Comment received related to the statement "a recruitment organization engaged by a healthcare facility to identify foreign educated nurses or CNAs for direct employment by the healthcare facility". Stated that the "word "direct" is a specific nuance of our industry, and our nurses are not placed for "direct employment". I am respectfully asking for your consideration of slight modification: "recruitment organization engaged by a healthcare facility to identify foreign educated nurses or CNAs for placement at the healthcare facility."

Comments Received October 28, 2025

**Patrick T. Treacy** - Employment Policy Counsel - [ptreacy@americanstaffing.net](mailto:ptreacy@americanstaffing.net)

1) Comment received: Section §7703 of the proposed rule refers to "a person employed or engaged as a contractor by the nurse staffing agency". The prior version of the rules referred to "independent" contractor, but the meaning and intent is the same, i.e. to distinguish employees from individuals who are in business for themselves. We have a concern regarding the criteria for determining whether nurses and certified nurse aides (CNAs) deployed by Healthcare Technology Platforms can be classified as a "Contractor". The proposed rule would define a nurse or CNA as a "contractor" based solely on the fact that the licensed nurse or CNA can choose "where, when, and how often to work." This conflicts with longstanding federal wage, tax, and benefits law as well as Louisiana state law.

Proposed the following: Strike the language: "A nurse staffing agency operating as a healthcare technology platform shall designate a nurse as a person of contact for all healthcare facilities." If the Department determines that all NSAs must have a designated point of contact based on statutory requirements, we recommend instead introducing a new standalone provision in a separate section of the rule that would read as follows: "All nurse staffing agencies shall maintain a designated point of contact for healthcare facilities regarding technical and operational matters. Such contact need not be a licensed nurse unless the nurse staffing agency directly employs or supervises nursing staff."

2) To ensure consistency throughout the rule, we also recommend that the Department broaden the CNA, LPN, RN, and nurse definitions, where they currently reference professionals "bidding" on shifts, to likewise include "selecting or accepting" shifts.

Comments Received October 29, 2025

**Nursa** - Kerry Brown, General Counsel; **KARE** - Rich Kortum, VP of Strategic Partnerships; **Clipboard** - Matt Orlins, Counsel; **o** Dave Barmore, Runway Strategies [dave@runwaystrategies.co](mailto:dave@runwaystrategies.co)

1) Comment received: "Nurse as Person of Contact" requirement for technology platforms does not take into account the unique business models of technology-enabled marketplaces. Healthcare technology platforms like ours do not employ, supervise, or place nurses in the traditional sense. Rather, they provide digital infrastructure that allows independent, licensed professionals to directly connect with facilities. Because platforms do not exercise control over the manner or means of clinical work, they are not structured to maintain a nurse "point of contact" who could speak to or oversee clinical operations on behalf of independent contractors. Requiring one would mischaracterize the platform's function and introduce potential misalignment with independent-contractor and liability frameworks

Comments Received November 4, 2025

**Elite Health Solutions, LLC** - Joanna King and Carla Anderson  
[joanna@elitehealthsolution.com](mailto:joanna@elitehealthsolution.com)

1) Comment received: concerns regarding a shift from W-2 to 1099 contractor status and liability in the event of an injury, asked which regulatory body would have authority over classification, opposes removal of background check requirements.

**SUMMARY OF PUBLIC COMMENTS**  
**NOI – Nurse Staffing Agencies (LAC 48:I.Chapter 77)**  
***Potpourri Hearing Held October 28, 2025***

No comments received

**SUMMARY OF PUBLIC COMMENTS**  
**NOI – Nurse Staffing Agencies (LAC 48:I.Chapter 77)**  
***Potpourri Hearing Held March 3, 2026***

<p><b>Health Carousel</b> - Amber Sprengard                  VP of Government Affairs &amp; External Relations                  Amber.sprengard@healthcarousel.com                  1) Comment received: current language for exception to licensure presents a conflict for her agency. Requested a modification</p>	<p>Comments received March 3, 2026</p>
<p><b>AMN Healthcare</b> - Claudia Joly                  Sr. Director Compliance &amp; Regulatory Services                  claudia.joly@amnhealthcare.com                  1) Recommends exclusion from licensure requirements, all international nursing agencies whether providing nurses or CNAs for direct employment or temporary contracting of 24 or more months.</p>	<p>Comments received March 4, 2026</p>
<p><b>Nursa</b> - Kerry Brown, General Counsel, <b>KARE</b> - Rich Kortum, VP of Strategic Partnerships, <b>Clipboard</b> - Matt Orlins, Counsel, c/o Dave Barmore, Runway Strategies                  dave@runwaystrategies.co                  1) Comment received: "Nurse as Person of Contact" requirement for technology platforms does not take into account the unique business models of technology-enabled marketplaces. Healthcare technology platforms like ours do not employ, supervise, or place nurses in the traditional sense. Rather, they provide digital infrastructure that allows independent, licensed professionals to directly connect with facilities. Because platforms do not exercise control over the manner or means of clinical work, they are not structured to maintain a nurse "point of contact" who could speak to or oversee clinical operations on behalf of independent contractors. Requiring one would mischaracterize the platform's function and introduce potential misalignment with independent-contractor and liability frameworks.</p>	<p>Comments received March 4, 2026</p>

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

August 28, 2025

Mr. Marc Hebert, Esq.  
Jones Walker, LLP  
Via email: joneswalker.com

**RE: Notice of Intent for Nurse Staffing Agencies  
Licensing Standards (LAC 48:I.Chapter 77)**

Dear Mr. Hebert:

This letter is in response to your correspondence regarding the Notice of Intent (NOI) for Nurse Staffing Agencies (NSA) Licensing Standards, which was published in the June 20, 2025 edition of the *Louisiana Register*.

The NOI proposed to amend the provisions governing the licensing of NSAs in order to add and update definitions, adjust social media policy requirements, revise administrator requirements, and modify initial licensure, renewal of licensure, and change of ownership requirements. After thorough review and consideration, the Department has made the decision to amend the NOI and publish the updated version as a Potpourri in an upcoming edition of the *Louisiana Register*.

We appreciate your willingness to provide comments regarding these amendments to the licensing provisions for NSAs, and hope that you will continue to work with us as we strive to improve healthcare outcomes for Louisiana citizens. Please note that you may request waiver of certain licensing regulations that are not also statutorily required, so long as you successfully demonstrate that the granting of such waiver would not compromise the health, safety, and welfare of recipients of healthcare services.

Should you have any questions or comments regarding Health Standards Section administrative rulemaking activity, you may contact Dr. Cynthia York, Rulemaking Liaison, by email at [Cynthia.york@la.gov](mailto:Cynthia.york@la.gov).

Sincerely,

DocuSigned by:

Handwritten signature of Tashika Dukes in black ink.

Tashika Dukes, RN  
Deputy Assistant Secretary  
LDH, Health Standards Section

cc: Kimberly Humbles, Esq.  
Christina Robertson, Esq.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

August 28, 2025

Mr. Kerry Brown  
C/O Mr. Dave Bormore

Via email: [dave@runwaystrategies.co](mailto:dave@runwaystrategies.co)>

**RE: Notice of Intent for Nurse Staffing Agencies  
Licensing Standards (LAC 48:I.Chapter 77)**

Dear Mr. Brown:

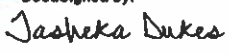
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Sincerely,

DocuSigned by:  
  
~~Jashika Dukes~~, RN  
Deputy Assistant Secretary  
LDH, Health Standards Section

cc: Kimberly Humbles, Esq.  
Christina Robertson, Esq.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

August 28, 2025

Ms. Flora Pappas  
15401 S. 14<sup>th</sup> Place  
Phoenix, AZ 85048

**RE: Notice of Intent for Nurse Staffing Agencies  
Licensing Standards (LAC 48:I.Chapter 77)**

Dear Ms. Pappas:

This letter is in response to your correspondence regarding the Notice of Intent (NOI) for Nurse Staffing Agencies (NSA) Licensing Standards, which was published in the June 20, 2025 edition of the *Louisiana Register*.

The NOI proposed to amend the provisions governing the licensing of NSAs in order to add and update definitions, adjust social media policy requirements, revise administrator requirements, and modify initial licensure, renewal of licensure, and change of ownership requirements. After thorough review and consideration, the Department has made the decision to amend the NOI and publish the updated version as a Potpourri in an upcoming edition of the *Louisiana Register*.

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Sincerely,

DocuSigned by:

Handwritten signature of Jasheka Dukes in black ink.

Jasheka Dukes, RN

Deputy Assistant Secretary  
LDH, Health Standards Section

cc: Kimberly Humbles, Esq.  
Christina Robertson, Esq.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

August 28, 2025

Mr. Mark Savoie

Via email: [masavoie@mac.com](mailto:masavoie@mac.com)

**RE: Notice of Intent for Nurse Staffing Agencies  
Licensing Standards (LAC 48:I.Chapter 77)**

Dear Mr. Savoie:

This letter is in response to your correspondence regarding the Notice of Intent (NOI) for Nurse Staffing Agencies (NSA) Licensing Standards, which was published in the June 20, 2025 edition of the *Louisiana Register*.

The NOI proposed to amend the provisions governing the licensing of NSAs in order to add and update definitions, adjust social media policy requirements, revise administrator requirements, and modify initial licensure, renewal of licensure, and change of ownership requirements. After thorough review and consideration, the Department has made the decision to amend the NOI and publish the updated version as a Potpourri in an upcoming edition of the *Louisiana Register*.

We appreciate your willingness to provide comments regarding these amendments to the licensing provisions for NSAs, and hope that you will continue to work with us as we strive to improve healthcare outcomes for Louisiana citizens. Please note that you may request waiver of certain licensing regulations that are not also statutorily required, so long as you successfully demonstrate that the granting of such waiver would not compromise the health, safety, and welfare of recipients of healthcare services.

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Sincerely,

DocuSigned by:

Handwritten signature of Jasheka Dukes in black ink.

Jasheka Dukes, RN  
Deputy Assistant Secretary  
LDH, Health Standards Section

cc: Kimberly Humbles, Esq.  
Christina Robertson, Esq.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

August 29, 2025

Ms. Leticia Lamarque, Esq.  
MedPro Healthcare Staffing

Via email: [llamarque@medprostaffing.com](mailto:llamarque@medprostaffing.com)

**RE: Notice of Intent for Nurse Staffing Agencies  
Licensing Standards (LAC 48:I.Chapter 77)**

Dear Ms. Lamarque:

This letter is in response to your correspondence regarding the Notice of Intent (NOI) for Nurse Staffing Agencies (NSA) Licensing Standards, which was published in the June 20, 2025 edition of the *Louisiana Register*.

The NOI proposed to amend the provisions governing the licensing of NSAs in order to add and update definitions, adjust social media policy requirements, revise administrator requirements, and modify initial licensure, renewal of licensure, and change of ownership requirements. After thorough review and consideration, the Department has made the decision to amend the NOI and publish the updated version as a Potpourri in an upcoming edition of the *Louisiana Register*.

We appreciate your willingness to provide comments regarding these amendments to the licensing provisions for NSAs, and hope that you will continue to work with us as we strive to improve healthcare outcomes for Louisiana citizens. Please note that you may request waiver of certain licensing regulations that are not also statutorily required, so long as you successfully demonstrate that the granting of such waiver would not compromise the health, safety, and welfare of recipients of healthcare services.

Should you have any questions or comments regarding Health Standards Section administrative rulemaking activity, you may contact Dr. Cynthia York, Rulemaking Liaison, by email at [Cynthia.york@la.gov](mailto:Cynthia.york@la.gov).

Sincerely,

DocuSigned by:

Handwritten signature of Jasheka Dukes in black ink.

Jasheka Dukes, RN  
Deputy Assistant Secretary  
LDH, Health Standards Section

cc: Kimberly Humbles, Esq.  
Christina Robertson, Esq.

Ms. Amber Sprengard  
VP of Government Affairs & External Relations  
December 18, 2025  
Page 2

We appreciate your willingness to provide comments regarding these amendments to the licensing provisions for providers of nurse staffing agency services, and hope that you will continue to work with us as we strive to improve health care outcomes for Louisiana citizens.

Should you have any questions or comments regarding the department's administrative rulemaking activity, you may contact Dr. Cynthia York, HSS Rulemaking Liaison.

Sincerely,

Signed by:



Cecile Castello, RN

Interim Deputy Assistant Secretary  
LDH Health Standards Section

cc: Christina Robertson, Esq.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

December 18, 2025

Ms. Amber Sprengard  
VP of Government Affairs & External Relations

Via email: [amber.sprengard@healthcarousel.com](mailto:amber.sprengard@healthcarousel.com)

**RE: Potpourri Notice for Nurse Staffing Agencies Licensing Standards  
(LAC 48:I.Chapter 77)**

Dear Ms. Sprengard:

In accordance with the provisions of the Administrative Procedure Act, R.S. 49:950 et seq., the Department of Health, Health Standards Section (the department), published a Notice of Intent in the June 20, 2025 edition of the *Louisiana Register* (LR 51:888-894) to amend LAC 48:I.Chapter 77, as authorized by R.S. 36:254. This Notice of Intent proposed to amend the provisions governing the licensing of nurse staffing agencies in order to add and update definitions, adjust social media policy requirements, revise administrator qualifications, and modify initial licensure, renewal of licensure, and change of ownership requirements.

As a result of comments received in response to the proposed Rule, the department determined that additional, non-technical revisions were necessary to the provisions of the June 20, 2025 Notice of Intent. A Potpourri was published in the September 20, 2025 edition of the *Louisiana Register* to announce said revisions, and a public hearing was held on October 28, 2025.

Following publication of the Potpourri, the department received additional comments and as a result thereof, the department has determined that further non-technical revisions are necessary. A second Potpourri will be published in an upcoming edition of the *Louisiana Register* that will reflect revisions that closely align with the department's original intent and the concerns brought forth during the comment period for the Notice of Intent and the Potpourri as originally published.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

December 18, 2025

Mr. Patrick T. Treacy  
American Staffing Agency

Via email: [ptreacy@americanstaffing.net](mailto:ptreacy@americanstaffing.net)

**RE: Potpourri Notice for Nurse Staffing Agencies Licensing Standards  
(LAC 48:I.Chapter 77)**

Dear Mr. Treacy:

In accordance with the provisions of the Administrative Procedure Act, R.S. 49:950 et seq., the Department of Health, Health Standards Section (the department), published a Notice of Intent in the June 20, 2025 edition of the *Louisiana Register* (LR 51:888-894) to amend LAC 48:I.Chapter 77, as authorized by R.S. 36:254. This Notice of Intent proposed to amend the provisions governing the licensing of nurse staffing agencies in order to add and update definitions, adjust social media policy requirements, revise administrator qualifications, and modify initial licensure, renewal of licensure, and change of ownership requirements.

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We appreciate your willingness to provide comments regarding these amendments to the licensing provisions for providers of nurse staffing agency services, and hope that you will continue to work with us as we strive to improve health care outcomes for Louisiana citizens.

Mr. Patrick Treacy  
American Staffing Agency  
December 18, 2025  
Page 2

Should you have any questions or comments regarding the department's administrative rulemaking activity, you may contact Dr. Cynthia York, HSS Rulemaking Liaison.

Sincerely,

Signed by:



Cecile Castello, RN

Interim Deputy Assistant Secretary  
LDH Health Standards Section

cc: Christina Robertson, Esq.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

December 18, 2025

Mr. Kerry Brown  
Mr. Rich Kortum  
Mr. Matt Orlins

c/o Mr. Dave Barmore  
Runway Strategies

Via email: [dave@runwaystrategies.co](mailto:dave@runwaystrategies.co)

**RE: Potpourri Notice for Nurse Staffing Agencies Licensing Standards  
(LAC 48:I.Chapter 77)**

Gentlemen:

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Mr. Kerry Brown  
Mr. Rich Kortum  
Mr. Matt Orlins  
c/o Mr. Dave Barmore  
December 18, 2025  
Page 2

We appreciate your willingness to provide comments regarding these amendments to the licensing provisions for providers of nurse staffing agency services, and hope that you will continue to work with us as we strive to improve health care outcomes for Louisiana citizens.

Should you have any questions or comments regarding the department's administrative rulemaking activity, you may contact Dr. Cynthia York, HSS Rulemaking Liaison.

Sincerely,

Signed by:



Cecile Castello, RN

Interim Deputy Assistant Secretary  
LDH Health Standards Section

cc: Christina Robertson, Esq.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

December 18, 2025

Ms. Joanna King  
Ms. Carla Anderson  
Elite Health Solutions, LLC

Via email: [joanna@elitehealthsolution.com](mailto:joanna@elitehealthsolution.com)

**RE: Potpourri Notice for Nurse Staffing Agencies Licensing Standards  
(LAC 48:I.Chapter 77)**

Dear Ms. King and Ms. Anderson:

In accordance with the provisions of the Administrative Procedure Act, R.S. 49:950 et seq., the Department of Health, Health Standards Section (the department), published a Notice of Intent in the June 20, 2025 edition of the *Louisiana Register* (LR 51:888-894) to amend LAC 48:I.Chapter 77, as authorized by R.S. 36:254. This Notice of Intent proposed to amend the provisions governing the licensing of nurse staffing agencies in order to add and update definitions, adjust social media policy requirements, revise administrator qualifications, and modify initial licensure, renewal of licensure, and change of ownership requirements.

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Ms. Joanna King  
Ms. Carla Anderson  
Elite Health Solutions, LLC  
December 18, 2025  
Page 2

We appreciate your willingness to provide comments regarding these amendments to the licensing provisions for providers of nurse staffing agency services, and hope that you will continue to work with us as we strive to improve health care outcomes for Louisiana citizens.

Should you have any questions or comments regarding the department's administrative rulemaking activity, you may contact Dr. Cynthia York, HSS Rulemaking Liaison.

Sincerely,

Signed by:



281081P2158F430  
Cecile Castello, RN

Interim Deputy Assistant Secretary  
LDH Health Standards Section

cc: Christina Robertson, Esq.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

March 5, 2026

Ms. Claudia Joly  
Sr. Director Compliance & Regulatory Services

Via email: [claudia.joly@amhealthcare.com](mailto:claudia.joly@amhealthcare.com)

**RE: Notices of Intent for Nurse Staffing Agencies  
Licensing Standards (LAC 48:I.Chapter 77)**

Dear Ms. Joly:

This letter is in response to your correspondence regarding publication of a Notice of Intent (NOI) on June 20, 2025, and/or two subsequent updated versions of the NOI published as Potpourri Notices on September 20, 2025 and January 20, 2026, respectively in the *Louisiana Register (LR)*.

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After thorough review and due consideration of your concerns, the decision has been made to continue with the provisions of the NOIs as published in the *LR*. It is anticipated that the final rule will appear in the May 20, 2026 edition of the *LR*.

We appreciate your willingness to provide comments regarding the proposed licensing provisions for NSAs, and hope that you will continue to work with us as we strive to improve healthcare outcomes for Louisiana citizens.

Should you have any questions or comments regarding Health Standards Section administrative rulemaking activity, you may contact Dr. Cynthia York, Rulemaking Program Manager, by email at [Cynthia.york@la.gov](mailto:Cynthia.york@la.gov).

Sincerely,

Signed by:

Handwritten signature of Cecile Castello in black ink.

Cecile Castello, RN

Interim, Deputy Assistant Secretary  
LDH, Health Standards Section

cc: Christina Robertson, Esq.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

March 5, 2026

Ms. Amber Sprengard  
VP of Government Affairs & External Relations

Via email: [amber.sprengard@healthcarousel.com](mailto:amber.sprengard@healthcarousel.com)

**RE: Notices of Intent for Nurse Staffing Agencies  
Licensing Standards (LAC 48:I.Chapter 77)**

Dear Ms. Sprengard:

This letter is in response to your correspondence regarding publication of a Notice of Intent (NOI) on June 20, 2025, and/or two subsequent updated versions of the NOI published as Potpourri Notices on September 20, 2025 and January 20, 2026, respectively in the *Louisiana Register (LR)*.

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Sincerely,

Signed by:

A handwritten signature in black ink that reads "Ceite Castello".

Ceite Castello, RN

Interim, Deputy Assistant Secretary  
LDH, Health Standards Section

cc: Christina Robertson, Esq.

**Jeff Landry**  
GOVERNOR



**Bruce D. Greenstein**  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

March 5, 2026

Mr. Frank Eaves  
CFO, KARE

Mr. Kerry Brown  
General Counsel, NURSA

Mr. Matt Orlins  
Counsel, Clipboard

C/O Mr. Dave Barmore  
Via email: [dave@runwaystrategies.co](mailto:dave@runwaystrategies.co)

**RE: Notices of Intent for Nurse Staffing Agencies  
Licensing Standards (LAC 48:I.Chapter 77)**

Gentlemen:

This letter is in response to your correspondence regarding publication of a Notice of Intent (NOI) on June 20, 2025, and/or two subsequent updated versions of the NOI published as Potpourri Notices on September 20, 2025 and January 20, 2026, respectively in the *Louisiana Register (LR)*.

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Sincerely,

Signed by:  
  
Cecile Castello, RN

Interim, Deputy Assistant Secretary  
LDH, Health Standards Section

cc: Christina Robertson, Esq.

## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, March 20, 2026 2:48 PM  
**To:** Cynthia York  
**Subject:** FW: Nurse Staffing Agencies - Notices of Intent  
**Attachments:** Eaves.F\_Brown.K\_Orlins.M\_Potpourri\_response.to.comments.received.docx.pdf

**dummysmailid:** 0000000083DC1BCD2B25B349A055F781E2C3D32C070080F4DCC75EEBE24D83C1E6CC2E9DEB7D00000A942020000AC801BC0FEC3254AA417FB523B8F9F350000090E82520000

**From:** Cynthia York <Cynthia.York@LA.GOV>

**Sent:** Thursday, March 5, 2026 11:39 AM

**To:** dave@runwaystrategies.co

**Cc:** Cecile Castello (LDH) <Cecile.Castello2@la.gov>; Christina Robertson <Christina.Robertson@LA.GOV>; LaVon Raymond Johnson <LaVon.Johnson@LA.GOV>; William Whatley <William.Whatley@LA.GOV>; Libby Gonzales <Libby.Gonzales@LA.GOV>; Michael Mire <Michael.Mire@LA.GOV>; Alisa Morris <Alisa.Morris@la.gov>; Cynthia York <Cynthia.York@LA.GOV>

**Subject:** Nurse Staffing Agencies - Notices of Intent

**Mr. Eaves, Mr. Brown, and Mr. Orlins,**

Thank you for your correspondence regarding the Notices of Intent for nurse staffing agencies licensing standards, which were published in the *Louisiana Register* on June 20, 2025, September 20, 2025, and January 20, 2026.

Your comments have been thoroughly reviewed and considered, and I have attached herein a response on behalf of Ms. Cecile Castello, RN, Interim Deputy Assistant Secretary, Health Standards Section.

Best regards,

*Cynthia York*

Cynthia York, DNP, RN, MCPM, FRE  
*Program Manager, Rulemaking and Policy Development*  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health, Health Standards Section  
628 North 4<sup>th</sup> Street  
Baton Rouge, LA 70802  
[Cynthia.york@la.gov](mailto:Cynthia.york@la.gov)  
Phone: (225) 342-9049  
Fax: (225) 342-0157



## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, March 20, 2026 2:47 PM  
**To:** Cynthia York  
**Subject:** FW: Nurse Staffing Agencies - Notices of Intent  
**Attachments:** Joly.C\_Potpourri\_response.to.comments.received.docx.pdf

**dummymailid:** 0000000083DC1BCD2B25B349A055F781E2C3D32C070080F4DCC75EEBE24D83C1E6CC2E9DEB7D000000A942020000AC801BC0FEC3254AA417FB523B8F9F350000090E824E0000

**From:** Cynthia York <Cynthia.York@LA.GOV>  
**Sent:** Thursday, March 5, 2026 11:39 AM  
**To:** Cynthia York <Cynthia.York@LA.GOV>  
**Subject:** FW: Nurse Staffing Agencies - Notices of Intent

**From:** Cynthia York  
**Sent:** Thursday, March 5, 2026 11:33 AM  
**To:** [claudia.joly@amnhealthcare.com](mailto:claudia.joly@amnhealthcare.com)  
**Cc:** Cecile Castello (LDH) ; Christina Robertson ; LaVon Raymond Johnson ; William Whatley ; Libby Gonzales ; Michael Mire ; Alisa Morris ; Cynthia York  
**Subject:** Nurse Staffing Agencies - Notices of Intent

Ms. Joly,

Thank you for your correspondence regarding the Notices of Intent for nurse staffing agencies licensing standards, which were published in the *Louisiana Register* on June 20, 2025, September 20, 2025, and January 20, 2026.

Your comments have been thoroughly reviewed and considered, and I have attached herein a response on behalf of Ms. Cecile Castello, RN, Interim Deputy Assistant Secretary, Health Standards Section.

Best regards,

*Cynthia York*

Cynthia York, DNP, RN, MCPM, FRE  
*Program Manager, Rulemaking and Policy Development*  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health, Health Standards Section  
628 North 4<sup>th</sup> Street  
Baton Rouge, LA 70802  
[Cynthia.york@la.gov](mailto:Cynthia.york@la.gov)  
Phone: (225) 342-9049  
Fax: (225) 342-0157

## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, March 20, 2026 2:48 PM  
**To:** Cynthia York  
**Subject:** FW: Nurse Staffing Agencies - Notices of Intent  
**Attachments:** Sprengard.A\_Potpourri\_response.to.comments.received.pdf  
**dummymailid:** 0000000083DC1BCD2B25B349A055F781E2C3D32C070080F4DCC75EEBE24D83C1E6CC2E9DEB7D000000A942020000AC801BC0FEC3254AA417FB523B8F9F350000090E8250000  
0

**From:** Cynthia York <Cynthia.York@LA.GOV>  
**Sent:** Thursday, March 5, 2026 11:39 AM  
**To:** Cynthia York <Cynthia.York@LA.GOV>  
**Subject:** FW: Nurse Staffing Agencies - Notices of Intent

**From:** Cynthia York  
**Sent:** Thursday, March 5, 2026 11:37 AM  
**To:** [amber.sprengard@healthcarousel.com](mailto:amber.sprengard@healthcarousel.com)  
**Cc:** Cecile Castello (LDH) ; Christina Robertson ; LaVon Raymond Johnson ; William Whatley ; Libby Gonzales ; Michael Mire ; Alisa Morris ; Cynthia York  
**Subject:** Nurse Staffing Agencies - Notices of Intent

**Ms. Sprengard,**

Thank you for your correspondence regarding the Notices of Intent for nurse staffing agencies licensing standards, which were published in the *Louisiana Register* on June 20, 2025, September 20, 2025, and January 20, 2026.

Your comments have been thoroughly reviewed and considered, and I have attached herein a response on behalf of Ms. Cecile Castello, RN, Interim Deputy Assistant Secretary, Health Standards Section.

Best regards,

*Cynthia York*

Cynthia York, DNP, RN, MCPM, FRE  
Program Manager, Rulemaking and Policy Development  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health, Health Standards Section  
628 North 4<sup>th</sup> Street  
Baton Rouge, LA 70802  
[Cynthia.york@la.gov](mailto:Cynthia.york@la.gov)  
Phone: (225) 342-9049  
Fax: (225) 342-0157

## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, March 20, 2026 2:44 PM  
**To:** Cynthia York  
**Subject:** FW: Nurse Staffing Agencies Licensing Standards - Proposed Rule Revisions  
**Attachments:** NSA\_1st.potpourri.response.to.comments.joanna.king\_carla.anderson.docx.pdf

**dummymailid:** 0000000083DC1BCD2B25B349A055F781E2C3D32C070080F4DCC75EEBE24D83C1E6CC2E9DEB7D000000A942020000AC801BC0FEC3254AA417FB523B8F9F350000090E8246000

**From:** Cynthia York <Cynthia.York@LA.GOV>  
**Sent:** Thursday, December 18, 2025 2:05 PM  
**To:** joanna@elitehealthsolution.com  
**Cc:** Cecile Castello (LDH) <Cecile.Castello2@la.gov>; Christina Robertson <Christina.Robertson@LA.GOV>; LaVon Raymond Johnson <LaVon.Johnson@LA.GOV>; William Whatley <William.Whatley@LA.GOV>; Libby Gonzales <Libby.Gonzales@LA.GOV>; Michael Mire <Michael.Mire@LA.GOV>; Alisa Morris <Alisa.Morris@la.gov>; Cynthia York <Cynthia.York@LA.GOV>  
**Subject:** Nurse Staffing Agencies Licensing Standards - Proposed Rule Revisions

**Ms. King and Ms. Anderson,**

Thank you for providing comments regarding the Louisiana Department of Health, Health Standards Section's proposed Rule revisions for Nurse Staffing Agencies licensing standards. Attached please find a response from Ms. Cecile Castello, Interim Deputy Director.

Best regards,

*Cynthia York*

Cynthia York, DNP, RN, MCPM, FRE  
Health Standards Section, Rulemaking Liaison  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health  
628 North 4<sup>th</sup> Street  
Baton Rouge, LA 70802  
[Cynthia.york@la.gov](mailto:Cynthia.york@la.gov)  
Phone: (225) 342-9049  
Fax: (225) 342-0157



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## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, March 20, 2026 2:44 PM  
**To:** Cynthia York  
**Subject:** FW: Nurse Staffing Agencies Licensing Standards - Proposed Rule Revisions  
**Attachments:** NSA\_1st.potpourri.response.to.comments.brown.kortum.orlins.docx.pdf  
**dummymailid:** 0000000083DC1BCD2B25B349A055F781E2C3D32C070080F4DCC75EEBE24D83C1E6CC2E9DEB7D000000A942020000AC801BC0FEC3254AA417FB523B8F9F350000090E82440000

**From:** Cynthia York <Cynthia.York@LA.GOV>  
**Sent:** Thursday, December 18, 2025 2:03 PM  
**To:** dave@runwaystrategies.co  
**Cc:** Cecile Castello (LDH) <Cecile.Castello2@la.gov>; Christina Robertson <Christina.Robertson@LA.GOV>; LaVon Raymond Johnson <LaVon.Johnson@LA.GOV>; William Whatley <William.Whatley@LA.GOV>; Libby Gonzales <Libby.Gonzales@LA.GOV>; Michael Mire <Michael.Mire@LA.GOV>; Alisa Morris <Alisa.Morris@la.gov>; Cynthia York <Cynthia.York@LA.GOV>  
**Subject:** Nurse Staffing Agencies Licensing Standards - Proposed Rule Revisions

**Mr. Barmore,**

Thank you for providing comments on behalf of your clients regarding the Louisiana Department of Health, Health Standards Section's proposed Rule revisions for Nurse Staffing Agencies. Attached please find a response from Ms. Cecile Castello, Interim Deputy Director.

Best regards,

*Cynthia York*

Cynthia York, DNP, RN, MCPM, FRE  
Health Standards Section, Rulemaking Liaison  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health  
628 North 4<sup>th</sup> Street  
Baton Rouge, LA 70802  
[Cynthia.york@la.gov](mailto:Cynthia.york@la.gov)  
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## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, March 20, 2026 2:45 PM  
**To:** Cynthia York  
**Subject:** FW: Nurse Staffing Agencies Licensing Standards - Proposed Rule Revisions  
**Attachments:** NSA\_1st.potpourri.response.to.comments.patrick.treacy.docx.pdf

**dummyemailid:** 0000000083DC1BCD2B25B349A055F781E2C3D32C070080F4DCC75EEBE24D83C1E6CC2E9DEB7D000000A94202000AC801BC0FEC3254AA417FB523B8F9F350000090E824A0000

**From:** Cynthia York <Cynthia.York@LA.GOV>  
**Sent:** Thursday, December 18, 2025 1:52 PM  
**To:** ptreacy@americanstaffing.net  
**Cc:** Cecile Castello (LDH) <Cecile.Castello2@la.gov>; Christina Robertson <Christina.Robertson@LA.GOV>; LaVon Raymond Johnson <LaVon.Johnson@LA.GOV>; William Whatley <William.Whatley@LA.GOV>; Libby Gonzales <Libby.Gonzales@LA.GOV>; Michael Mire <Michael.Mire@LA.GOV>; Alisa Morris <Alisa.Morris@la.gov>; Cynthia York <Cynthia.York@LA.GOV>  
**Subject:** Nurse Staffing Agencies Licensing Standards - Proposed Rule Revisions

Mr. Treacy,

Thank you for providing comments regarding the Louisiana Department of Health, Health Standards Section's proposed Rule revisions for Nurse Staffing Agencies licensing standards. Attached please find a response from Ms. Cecile Castello, Interim Deputy Director.

Cynthia York, DNP, RN, MCPM, FRE  
Health Standards Section, Rulemaking Liaison  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health  
628 North 4<sup>th</sup> Street  
Baton Rouge, LA 70802  
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Fax: (225) 342-0157



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## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, March 20, 2026 2:44 PM  
**To:** Cynthia York  
**Subject:** FW: Nurse Staffing Agencies Licensing Standards - Proposed Rule Revisions  
**Attachments:** NSA\_1st.potpourri.response.to.comments.amber.sprengard.docx.pdf

**dummymailid:** 0000000083DC1BCD2B25B349A055F781E2C3D32C070080F4DCC75EEBE24D83C1E6CC2E9DEB7D000000A942020000AC801BC0FEC3254AA417FB523B8F9F350000090E82480000

**From:** Cynthia York <Cynthia.York@LA.GOV>  
**Sent:** Thursday, December 18, 2025 2:08 PM  
**To:** amber.sprengard@healthcarousel.com  
**Cc:** Cecile Castello (LDH) <Cecile.Castello2@la.gov>; Christina Robertson <Christina.Robertson@LA.GOV>; LaVon Raymond Johnson <LaVon.Johnson@LA.GOV>; William Whatley <William.Whatley@LA.GOV>; Libby Gonzales <Libby.Gonzales@LA.GOV>; Michael Mire <Michael.Mire@LA.GOV>; Alisa Morris <Alisa.Morris@la.gov>; Cynthia York <Cynthia.York@LA.GOV>  
**Subject:** Nurse Staffing Agencies Licensing Standards - Proposed Rule Revisions

**Ms. Sprengard,**

Thank you for providing comments regarding the Louisiana Department of Health, Health Standards Section's proposed Rule revisions for Nurse Staffing Agencies licensing standards. Attached please find a response from Ms. Cecile Castello, Interim Deputy Director.

Best regards,

*Cynthia York*

Cynthia York, DNP, RN, MCPM, FRE  
Health Standards Section, Rulemaking Liaison  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health  
628 North 4<sup>th</sup> Street  
Baton Rouge, LA 70802  
[Cynthia.york@la.gov](mailto:Cynthia.york@la.gov)  
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## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, August 29, 2025 11:51 AM  
**To:** masavoie@mac.com  
**Cc:** Tasheka Dukes; Christina Robertson; LaVon Raymond Johnson; William Whatley; Libby Gonzales; Michael Mire; Steffan W. Rutledge; Cynthia York  
**Subject:** Nurse Staffing Agencies - Notice of Intent - June 20, 2025  
**Attachments:** Savoie.M\_NSA\_NOI\_25.06\_response.to.comments.received.docx.pdf

**Mr. Savoie:**

Thank you for your email correspondence regarding the Notice of Intent for Nurse Staffing Agencies that was published in the June 20, 2025 edition of the *Louisiana Register*.

Your comments have been thoroughly reviewed and considered, and I have attached herein a response from Ms. Tasheka Dukes, RN, Deputy Assistant Secretary, Health Standards Section.

Best regards,

*Cynthia York*

Cynthia York, DNP, RN, MCPM, FRE  
Health Standards Section, Rulemaking Liaison  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health  
628 North 4<sup>th</sup> Street  
Baton Rouge, LA 70802  
[Cynthia.york@la.gov](mailto:Cynthia.york@la.gov)  
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## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, March 20, 2026 2:41 PM  
**To:** Cynthia York  
**Subject:** FW: Nurse Staffing Agencies - Notice of Intent - June 20, 2025  
**Attachments:** Lamarque.L\_NSA\_NOI\_25.06\_response.to.comments.received.docx.pdf

**dummymailid:** 0000000083DC1BCD2B25B349A055F781E2C3D32C070080F4DCC75EEBE24D83C1E6CC2E9DEB7D000000A942020000AC801BC0FEC3254AA417FB523B8F9F350000090E8242000  
0

**From:** Cynthia York  
**Sent:** Friday, August 29, 2025 11:48 AM  
**To:** 'llamarque@medprostaffing.com' <llamarque@medprostaffing.com>  
**Cc:** Tasheka Dukes <Tasheka.Dukes@LA.GOV>; Christina Robertson <Christina.Robertson@LA.GOV>; LaVon Raymond Johnson <LaVon.RaymondJohnson@la.gov>; William Whatley <William.Whatley@LA.GOV>; Libby Gonzales <Libby.Gonzales@LA.GOV>; Steffan W. Rutledge <Steffan.Rutledge@LA.GOV>; Michael Mire <Michael.Mire@LA.GOV>; Cynthia York <Cynthia.York@LA.GOV>  
**Subject:** Nurse Staffing Agencies - Notice of Intent - June 20, 2025

**Ms. Lamarque,**

Thank you for your email correspondence regarding the Notice of Intent for Nurse Staffing Agencies that was published in the June 20, 2025 edition of the *Louisiana Register*.

Your comments have been thoroughly reviewed and considered, and I have attached herein a response from Ms. Tasheka Dukes, RN, Deputy Assistant Secretary, Health Standards Section.

Best regards,

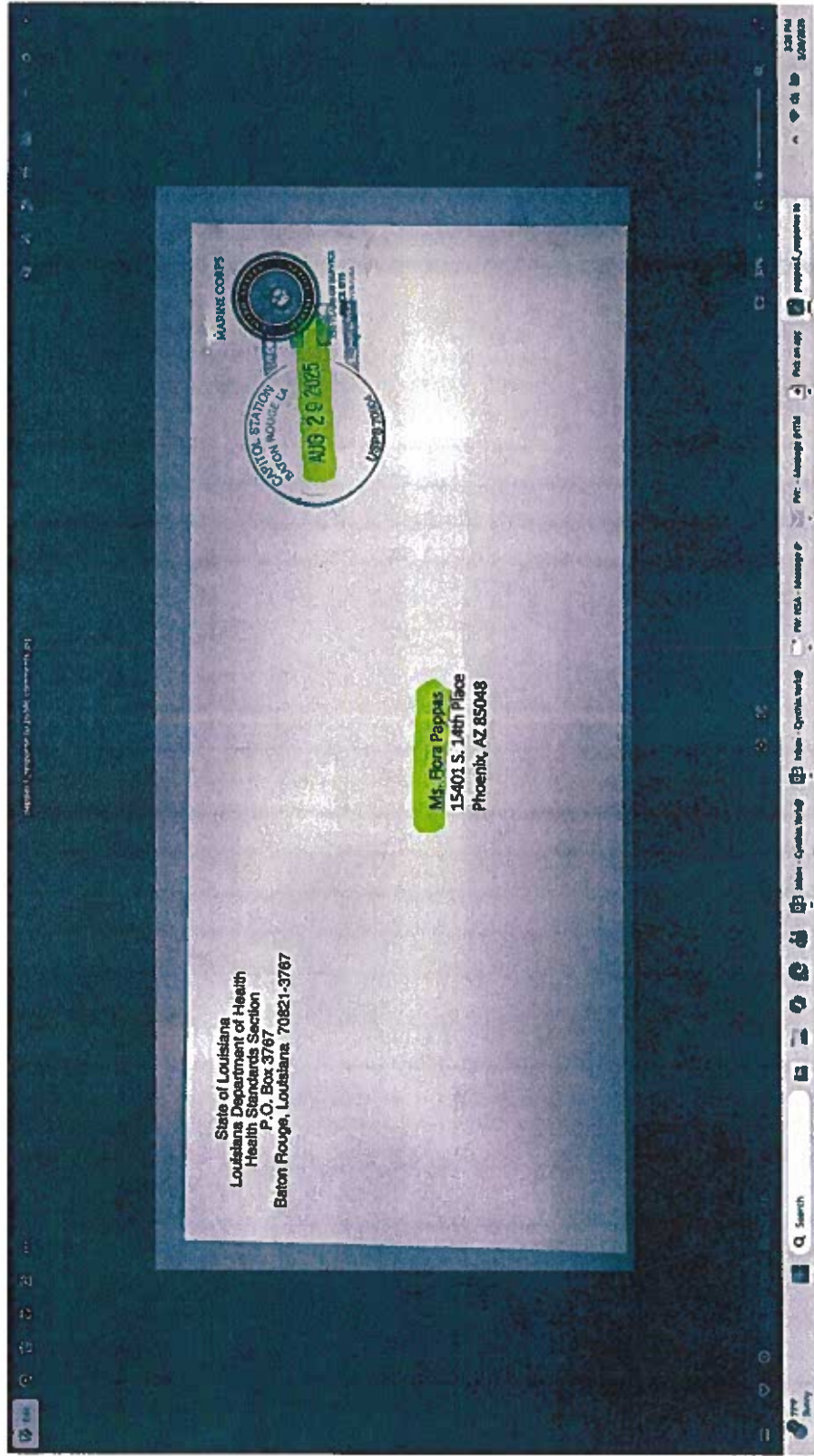
*Cynthia York*

Cynthia York, DNP, RN, MCPM, FRE  
Health Standards Section, Rulemaking Liaison  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health  
628 North 4<sup>th</sup> Street  
Baton Rouge, LA 70802  
[Cynthia.york@la.gov](mailto:Cynthia.york@la.gov)  
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Pappas.F. – Response to Comments – Proof of Response



## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, March 20, 2026 2:41 PM  
**To:** Cynthia York  
**Subject:** FW: Nurse Staffing Agencies - Notice of Intent Published June 20, 2025  
**Attachments:** Brown.K\_NSA\_NOI\_25.06\_response.to.comments.received.docx.pdf; Kortum.R\_NSA\_NOI\_25.06\_response.to.comments.received.docx.pdf

**dummymailid:** 0000000083DC1BCD2B25B349A055F781E2C3D32C070080F4DCC75EEBE24D83C1E6CC2E9DEB7D000000A942020000AC801BC0FEC3254AA417FB523B8F9F350000090E82400000

**From:** Cynthia York  
**Sent:** Friday, August 29, 2025 11:44 AM  
**To:** 'dave@runwaystrategies.co' <dave@runwaystrategies.co>  
**Cc:** Tasheka Dukes <Tasheka.Dukes@LA.GOV>; Christina Robertson <Christina.Robertson@LA.GOV>; LaVon Raymond Johnson <LaVon.RaymondJohnson@la.gov>; William Whatley <William.Whatley@LA.GOV>; Libby Gonzales <Libby.Gonzales@LA.GOV>; Steffan W. Rutledge <Steffan.Rutledge@LA.GOV>; Cynthia York <Cynthia.York@LA.GOV>; Michael Mire <Michael.Mire@LA.GOV>  
**Subject:** Nurse Staffing Agencies - Notice of Intent Published June 20, 2025

**Mr. Bormore,**

Thank you for your email correspondence on behalf of **Mr. Kerry Brown and Mr. Rich Kortum**, regarding the Notice of Intent for Nurse Staffing Agencies that was published in the June 20, 2025 edition of the *Louisiana Register*.

Your comments have been thoroughly reviewed and considered, and I have attached herein a response from Ms. Tasheka Dukes, RN, Deputy Assistant Secretary, Health Standards Section.

Best regards,

*Cynthia York*

Cynthia York, DNP, RN, MCPM, FRE  
Health Standards Section, Rulemaking Liaison  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health  
628 North 4<sup>th</sup> Street  
Baton Rouge, LA 70802  
[Cynthia.york@la.gov](mailto:Cynthia.york@la.gov)  
Phone: (225) 342-9049  
Fax: (225) 342-0157



## Cynthia York

---

**From:** Cynthia York  
**Sent:** Friday, March 20, 2026 2:40 PM  
**To:** Cynthia York  
**Subject:** FW: Nurse Staffing Agencies - June 20, 2025 Notice of Intent  
**Attachments:** Hebert.M.\_NSA\_NOI\_6.20.25\_response.to.comments.received.docx.pdf

**From:** Cynthia York

**Sent:** Friday, August 29, 2025 11:38 AM

**To:** 'mhebert@joneswalker.com' <mhebert@joneswalker.com>

**Cc:** Tasheka Dukes <Tasheka.Dukes@LA.GOV>; Christina Robertson <Christina.Robertson@LA.GOV>; LaVon Raymond Johnson <LaVon.RaymondJohnson@la.gov>; William Whatley <William.Whatley@LA.GOV>; Libby Gonzales <Libby.Gonzales@LA.GOV>; Michael Mire <Michael.Mire@LA.GOV>; Steffan W. Rutledge <Steffan.Rutledge@LA.GOV>; Cynthia York <Cynthia.York@LA.GOV>

**Subject:** Nurse Staffing Agencies - June 20, 2025 Notice of Intent

**Mr. Hebert,**

Thank you for your email correspondence regarding the Notice of Intent for Nurse Staffing Agencies that was published in the June 20, 2025 edition of the *Louisiana Register*.

Your comments have been thoroughly reviewed and considered, and I have attached herein a response from Ms. Tasheka Dukes, RN, Deputy Assistant Secretary, Health Standards Section.

Best regards,

*Cynthia York*

Cynthia York, DNP, RN, MCPM, FRE  
Health Standards Section, Rulemaking Liaison  
Fellow, NCSBN Institute of Regulatory Excellence  
Louisiana Department of Health  
628 North 4<sup>th</sup> Street  
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[Cynthia.york@la.gov](mailto:Cynthia.york@la.gov)  
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Jeff Landry  
GOVERNOR



Bruce D. Greenstein  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

**PUBLIC HEARING CERTIFICATION**

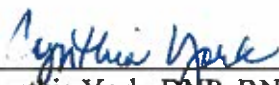
**March 3, 2026**

**9:30 a.m.**

RE: Nurse Staffing Agencies Licensing Standards  
Department of Health, Health Standards Section  
State of Louisiana

**CERTIFICATION**

In accordance with LA R.S. 49:950 et seq., the attached public hearing agenda together with one digital recording of the public hearing conducted on March 3, 2026 in Baton Rouge, Louisiana constitute the official record of the above-referenced public hearing.

  
\_\_\_\_\_  
Cynthia York, DNP, RN  
Health Standards Section

March 3, 2026  
\_\_\_\_\_  
Date

# LDH/HEALTH STANDARDS SECTION PUBLIC HEARING

Nurse Staffing Agencies  
Licensing Standards  
Potpourri

March 3, 2026

## PERSONS IN ATTENDANCE

Name	Address	Telephone Number	AGENCY or GROUP you represent
1. Cynthia York		225-342-9049	HSS
2. Christin Webster		225-342-4020	LDH Legis
3. Ceile Castello		225 342 4997	HSS
4. Allen Enger		225-342-1342	CBH
5. William Dhotray		225-342-6096	LDH
6. MICHAEL WEAVER		225-342-0255	LDH / HSS

Jeff Landry  
GOVERNOR



Bruce D. Greenstein  
SECRETARY

**State of Louisiana**  
Louisiana Department of Health  
Health Standards Section

**PUBLIC HEARING CERTIFICATION**  
**October 28, 2025**  
**9:30 a.m.**

RE: Nurse Staffing Agencies Licensing Standards  
Docket #10282025-01  
Department of Health, Health Standards Section  
State of Louisiana

**CERTIFICATION**

In accordance with LA R.S. 49:950 et seq., the attached public hearing agenda together with one digital recording of the public hearing conducted on October 28, 2025 in Baton Rouge, Louisiana constitute the official record of the above-referenced public hearing.

A handwritten signature in blue ink that reads "Cynthia York".

Cynthia York, DNP, RN  
Health Standards Section

October 28, 2025

Date

# LDH/HEALTH STANDARDS SECTION PUBLIC HEARING

Nurse Staffing Agencies  
 Licensing Standards  
 Potpourri

October 28, 2025

## PERSONS IN ATTENDANCE

Name	Address	Telephone Number	AGENCY or GROUP you represent
1. Cynthia York	LDH		HSS
2. Michael Metz	LOH		HSS
3. William WATLER	LDU		HSS
4. Stefan Rutledge	LDH		HSS
5. Ceaira Castelle	LDH		HSS
6.			