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From: Mike Wilt [MWILT@pacounties.org]
Sent: Monday, June 12, 2000 4:00 PM
To: 'irrc@irrc.state.pa.us'
Subject: Regulation #6-262

The Pennsylvania Association of County Affiliated Homes (PACAH) provides the following comments about the "Nurse Aide Applicant Criminal History Record Information" final regulations.

The nursing home industry in Pennsylvania is suffering from a desperate shortage of workers in many different facets of nursing home operations, including nurse aides. The requirement that a person relocating to Pennsylvania has to submit a request for an FBI criminal background check to the Department of Education who will then submit to the FBI will cause long delays for facilities and their ability to start these individuals in a nurse aide training class. With the present economy may of those individuals will obtain employment elsewhere, thus doing nothing to help the nurse aide shortage.

PACAH respectfully asks your assistance in finding a solution so that recently relocated individuals to Pennsylvania do not have to wait such a long period of time before they are able to begin their nurse aide training course.