

Stuart H. Fine
618 Cedar Hill Road
Ambler, PA 19002

February 22, 1999

Mr. Robert G. Cameron, Counsel
State Board of Examiners of Nursing
Home Administrators
PO Box 2649
Harrisburg, PA 17105-2649

ORIGINAL: 1999
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RECEIVED
99 MAR -1 AM 8:36
INDEPENDENT REGULATORY
REVIEW COMMISSION

RE: Proposed Revision of Nursing Home Administrator Relicensure Requirements

Mr. Cameron:

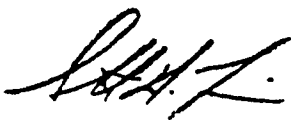
I am writing to express my *strong opposition* the proposed plan to limit NHA continuing education credit to those programs that are pre-approved, and to eliminate the option of receiving credit for professional health related board or organization involvement.

Many licensed Nursing Home Administrators are actively involved in professional health related boards and organizations through which those individuals receive more pertinent, more timely and better opportunities for education than is garnered through many "pre-approved" courses. These individuals put in many hours of effort that benefit not only themselves, but also the field of Nursing Home Administration and those residents / clients for whom NHA's are responsible.

To eliminate the option of applying for CE credits for efforts that pertain to health related board or organization involvements will increase costs, eliminate an incentive for NHA's to become involved in professional activities, and result in a decline in the overall quality of the NHA credential. Please endeavor to prevent the proposed change from being enacted into regulation.

Thank you very much.

Sincerely,



Stuart H. Fine, NHA

RECEIVED
FEB 24 1999
BPOA LEGAL COUNSEL



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

LEGAL OFFICE
PROSECUTION DIVISION
(717) 783-7200
Fax: (717) 787-0251

116 Pine Street
P.O. BOX 2649
HARRISBURG
17105-2649

FAX TRANSMITTAL

DATE: March 31, 1999

TO: John Jewett

FROM: Bob Cameron

FAX NUMBER: 783-2664

NUMBER OF PAGES INCLUDING COVER 3

COMMENTS: _____

PLEASE NOTE: The information contained in this facsimile message is privileged and confidential and is intended only for the use of the individual or entity named above and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, or if any problems occur with transmission, please notify us immediately by telephone. Thank you.

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PENNSYLVANIA
PROFESSIONAL COMMISSION



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99 MAR 31 PM 12:32

PR						
				APPL		

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF NURSING HOME ADMINISTRATORS
P.O. BOX 2649
HARRISBURG, PA 17105-2649
717-783-7155

REVIEW COMMISSION

APPLICATION FOR CONSIDERATION AS A PROVIDER OF CONTINUING EDUCATION PROGRAMS

- a. Submit application fee of \$50.00 payable to "Commonwealth of PA". This fee is for processing of the application, and is non-refundable.
- b. A processing fee of \$20.00 will be charged for any check or money order returned unpaid by your bank, regardless of the reason for non-payment.
- c. Your provider number must be renewed each biennium.
- d. This form must be printed or typed only.
- e. Applications for approval of programs must be submitted to this Board 3 months (90 days) in advance of presentation.

IT IS YOUR RESPONSIBILITY TO MAINTAIN A COPY OF THIS APPLICATION AND ALL DOCUMENTS SUBMITTED TO, OR RECEIVED FROM THE BOARD FOR YOUR FUTURE REFERENCE.

1. _____
Name of Provider (Agency, Organization, Institution, Center)

2. _____
Address City State Zip

3. _____
Telephone - Area Code and Number

4. Type of Provider: (Check One)

<input type="checkbox"/> Non-Profit Organization	<input type="checkbox"/> Government Agency
<input type="checkbox"/> For Profit Organization	<input type="checkbox"/> Academic Institution
<input type="checkbox"/> Professional Organization	<input type="checkbox"/> Other _____

5. Provide the Following:
Statement of purpose of provider: _____

6. Principal contact person:
Name _____ Telephone Number _____
Address _____
Street City State Zip

7. List programs you propose to offer during the next 6 months.

NAME	DATES

8. Check the following areas of expertise in which you propose to offer continuing education programs.

- | | |
|---|---|
| a. () Standards of environmental health and safety | g. () Therapeutic care in long term care |
| b. () Governmental health and safety regulations | h. () Supportive care services in long term care |
| c. () General administration | i. () Organization and management |
| d. () Psychology of patient care | j. () Community interrelationships |
| e. () Principles of medical care | k. () Other |
| f. () Personal and social care | |

9. Program Presenter-Faculty: The provider must give information for each individual who will serve as a program presenter. Only individuals whom Presenter-Faculty information has been submitted to the Board may serve as program presenters. Presenter-Faculty information is required for each presenter:

- a. Presenter's Name: _____ Presenter's Telephone Number (____) _____
- b. Presenter's Address: _____
- c. Attach current resume/bio which includes a list of educational programs for nursing home administrators taught by Presenter-Faculty.

10. What means will be used to publicize and announce the availability of the program to assure open attendance?
NOTE: When advertising do not indicate to prospective attendees, in any manner, that approval has been granted unless the provider approval number and continuing education program approval number has been issued by this Board.

11. Describe the mechanism that will be used to evaluate each program upon completion, including, but not limited to the following:

- a. Suitability of facility (classroom & environs) _____

- b. Effectiveness of presenter _____

- c. Appropriateness of subject matter _____

- d. Registrant attendance _____

- e. Registrant evaluation of program _____

- f. Appropriateness of instructional materials _____

- g. Other _____

12. NOTE: A summary of the evaluation should be available to the Board upon request.

"I verify that the statements in this application are true and correct to the best of my knowledge, information, and belief. I understand that false statements are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities and may result in the suspension or revocation of my approval."

Signature of Provider: _____ Date: _____

Sandra K. Fine
618 Cedar Hill Road
Ambler, PA 19002-1504

RECEIVED

ORIGINAL: 1999
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Legal

FEB 26 1999

BPOA LEGAL COUNSEL

February 22, 1999

Mr. Robert G. Cameron, Counsel
State Board of Examiners of Nursing
Home Administrators
PO Box 2649
Harrisburg, PA 17105-2649

RE: Proposed Revision of Nursing Home Administrator Relicensure Requirements

Mr. Cameron:

I am writing to express my *strong opposition* the proposed plan to limit NHA continuing education credit to those programs that are pre-approved, and to eliminate the option of receiving credit for professional health related board or organization involvement.

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Thank you very much.

Sincerely,



Sandra K. Fine, NHA

RECEIVED
NORTH CAROLINA
RENEWAL COMMISSION

99 MAR - 1 AM 8:35

RECEIVED

30

997 Regimental Drive
West Chester, PA 19382
March 4, 1999

RECEIVED
99 MAR 17 AM 8:49

Robert G. Cameron, Counsel
State Board of Examiners of Nursing Home Administrators
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105-2649

REGULATORY
REVIEW COMMISSION

ORIGINAL: 1999

MCGINLEY

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Sandusky
Legal

RE: Proposed Change to State Board of Examiners of Nursing Home Administrators, Continuing
Education 29PaB. 662

Dear Mr. Cameron:

I wish to provide comment regarding the proposed amended regulations relative to the continuing education requirements that are a condition of the biennial renewal process for licensed nursing home administrators. I believe that two areas jeopardize the purpose of continuing education as it relates to expanding and enhancing the skills of the administrator.

The first proposed change is: clarification of approved subject areas to ensure that the programs are relative to long-term care. Here is my concern. Long-term care is one of the fastest changing areas in health care. Today, many administrators are responsible for a range of programs that supplement the nursing home. Examples of these programs include home health services, adult day care, assisted living. In addition, administrators are working with health systems and third-party payors to build integrated networks. As an administrator who has experienced responsibility for this expanded role, I need to keep current in these areas. I am concerned that the regulatory process will not be able to acknowledge these changing educational needs in a timely fashion. Thus, the administrator would not be able to receive credit for new trend information. For me, and I suspect may other administrators, this change would cause us to pay more and be away from our work site longer in order to meet our NHA CEU requirements

The second proposed change that concerns me is: elimination of the option of credit hours on an individual basis for attendance at programs that have not had prior approval of the board. I have held a nursing home administrator's license for nearly 15 years and have a MBA and Masters in Nursing Administration. Each biennium renewal of my license has been obtained with approximately fifty percent of my credits coming from #002 Individual Program for Board Approval. This occurs because I have either previously attended the programs offered in my geographic area or these programs are not a subject which is relevant to my current needs. The #002 CEUs I have been granted have been from intense, focused programs that are offered on a national basis and attract many different types of executives. I do not believe these national programs will seek to get pre-approval from the PA Board of Nursing Home Examiners since there maybe only several attendees from Pennsylvania of which only one is a NHA.

Nursing Home Administrators are not a homogenous group. Their educational preparation varies from high school graduates to post-graduate education. Their span of responsibility varies as diversely as does their education. I have attended NHA Board of Examiner pre-approved programs which were not meeting my continuing educational need, but my purpose in attending is to fulfill the 24 credits in this area. I have observed my colleagues do office work or read documents during these sessions.

RECEIVED

MAR 08 1999

BPOA LEGAL COUNSEL

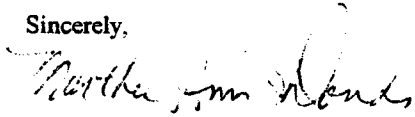
Robert G. Cameron
March 4, 1999

Page 2 of 2

In summary, I believe these proposed changes will add to the cost for administrators and their organizations. Nursing homes and other health organizations are experiencing continuing reductions in reimbursement. I also believe that these proposed changes will not enhance the individual administrator's ability to meet their specific educational needs. I request that these two proposed changes be eliminated.

Should you wish to discuss my concerns further, I can be reached at 800-283-9173 ext. 4501.

Sincerely,

A handwritten signature in cursive script that reads "Martha Ann J. Douds".

Martha Ann J. Douds, RN, NHA

Cc: George Gugoff, HAP



March 5, 1999

Kevin W. Jones, Board Chair • Ronald L. Barth, President/CEO

RECEIVED

MAR 11 1999

BPOA LEGAL COUNSEL

Mr. Robert G. Cameron, Counsel
State Board of Examiners of
Nursing Home Administrators
116 Pinc Street
P.O. Box 2649
Harrisburg, PA 17105-2649

ORIGINAL: 1999
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Legal

Dear Mr. Cameron:

The Pennsylvania Association of Non-Profit Homes for the Aging (PANPHA) is a statewide association representing 383 nonprofit long term care providers, including long term care nursing facilities. We provide the following comments on the proposed regulation (No. 16A-623) amending the State Board of Examiners of Nursing Home Administrators regulations, which was published in the February 6, 1999, Pennsylvania Bulletin.

- 1. We are pleased with the Board's proposal to reduce the program application submission date from 90 to 60 days. However, who do not support the decision to not permit licensees to seek approval of programs that were not preapproved. We believe that there are programs that currently licensed NHAs may attend whose program sponsor has not sought preapproval from the State Board. Usually this happens when the program sponsor anticipates that the primary audience attending the program will be non-NHAs. As an example at PANPHA, we normally do not seek preapproval for our annual conference for professional volunteer and activity directors. However, it is possible since these are programs open to all our members, that a NHA might attend and subsequently seek approval. I am enclosing PANPHA's 1998 Annual Volunteer Conference brochure.
2. On page 663 of the preamble to the proposed regulation, it is noted that new section 39.44 would delineate provider responsibilities ranging from...to "verification requirements following the presentation of the program". I cannot find any language in the new section regarding such verification. What is anticipated?

Thank you for the opportunity to comment.

Sincerely,

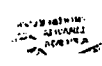
Handwritten signature of Christine Klejbuk

Christine Klejbuk

Enclosure

cc: John Jewett, IRRC

RECEIVED
99 MAR 17 AM 8:49
NON-PROFIT COMMISSION





PENNSYLVANIA ASSOCIATION OF NON-PROFIT HOMES FOR THE AGING

March 5, 1999

Kevin W. Jones, Board Chair • Ronald L. Barth, President/CEO

RECEIVED
MARCH 5 11 41 18
NON-PROFIT COMMISSION

Mr. Robert G. Cameron, Counsel
State Board of Examiners of
Nursing Home Administrators
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105-2649

ORIGINAL: 1999
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Thank you for the opportunity to comment.

Sincerely,

Christine Klejbuk

Enclosure

cc: John Jewett, IRRC



PROGRAM:

TUESDAY, OCTOBER 20, 1998

8:00 - 10:00 P.M. Hospitality
Meet the PVS Governing Body and other attendees!

WEDNESDAY, OCTOBER 21, 1998

8:00 A.M. Registration and Continental Breakfast

9:15 - 9:30 A.M. Welcome
Peggy Kammerer, Chair, PANPHA Volunteer Services Governing Body

9:30 - 11:45 A.M. Keynote Presentation -
"The Grass is Always Greener...How Green is Your Valley?" - Ann Haggerty Raines
Once we've rounded 'em up and pulled 'em in, how do we keep them? On the range (and where you work) burnout is always a problem. What motivates people? How can we tap into the intrinsic motivators within our volunteers, our staff, and our selves? Everyone could use some extra "hands", but as resources dry up, we need to learn to do more with less, develop our willing "hands", paid and unpaid, and delegate more to them.

11:45 A.M. - 12:45 P.M. Lunch

~~1:00 - 2:30 P.M. Concurrent Workshops~~

A. "When Hearts Sorrow" - Laryl Fett

(General Audience)

Participants will explore grief awareness and identify common physical and psycho-social-spiritual needs of grieving elders, as well as ways in which such needs might be programmatically addressed. Participants will be able to differentiate between abnormal and normal grief and learn how to help rebuild the fire of optimism and peace in people who sometimes feel as though all they have left is ashes. This session will also cover self and staff grief relief, as grief can have an impact on others than the bereaved.

B. "Intergenerationally Speaking" - Jeffrey Elinoff

(Activities)

This presentation will illustrate several years of intergenerational programming from the very successful seniors program at the University of Pittsburgh, "Generations Together." The presenter was a teenage volunteer in the program, who then facilitated other adolescents in the program, and is now the Activity and Outreach Director of a large senior apartment complex, facilitating intergenerational programs regularly.

C. "Colorful Characters & Don't Push My Buttons" - Part I - Linda and Phillip Mallin

(Personality Types and Team Building-DVS) [continues at 3:00 P.M.]

Participants will discover their personality type, learn the four pairs of opposite personality traits measured in the questionnaire, and develop an understanding of the strengths and weaknesses of each trait. Strategies to fill in for each other's weaknesses will be explored, as well as learning to "translate" negative phrases into positive or neutral statements, using work-related examples.

~~3:00 - 4:30 P.M. Concurrent Workshops~~

D. "The Uncommon Touch" - Laryl Fett

(General Audience)

The uncommon power of the common touch will be explored in this session. Research shows that a compassionate touch can: address loneliness and decrease agitation; raise one's stress threshold; increase tolerance to pain; and draw one out from a self-chosen life withdrawal. Research has also revealed that many of those in long-term care are touch-starved. The presenter will cover such topics as Who Should Do and How To Do Effective Touching and Touch Style Tools for Specific Psycho-Social-Spiritual Needs.

E. "Coping with Difficult Behaviors in Alzheimer's Disease" - Lois Eastlick*(Activities)*

This session will include possible causes and coping strategies for many behaviors associated with Alzheimer's disease such as wandering, aggressiveness, sundowning, combativeness, and repetitive behaviors. Participants will gain a better understanding of causes of difficult behaviors and will acquire practical resources to utilize when interacting with Alzheimer's residents.

F. "Colorful Characters & Don't Push My Buttons" - Part II - Linda and Phillip Malin

(Personality Types and Team Building-DVS) [continued from 1:00 P.M.]

6:00 P.M.

Dinner With a Touch of the Prairie

7:00 - 9:00 P.M.

Scoot Your Boots and Wear Your Jeans: Country Line Dancing!

Watch a demonstration and get a chance to learn one or two of the dances in the latest dance craze!
Dessert Social at 8:00 P.M.

THURSDAY, OCTOBER, 22, 1998

8:00 A.M.

Buffet Breakfast and Chapter Meetings

8:30 - 10:00 A.M.

Concurrent Workshops**G. "Recruiting for Today's Auxiliaries" - Charlene Shapiro***(Auxiliary/Volunteer)*

This interactive workshop will focus on ways to get people to say "yes" when asked to join your auxiliary. Participants will examine strategies designed to enhance and expand volunteer recruitment and retention efforts and create an organization that will meet the needs of today's health care institutions and the changing lifestyles of today's volunteers.

H. "MDS 2.0 - Understanding Section N, RAPS, and Triggers" - Maggie Gioffre*(Activities)*

This session will offer the activity professional in long-term care information on the revised state approved MDS 2.0 and remove the mystery of the form and how areas trigger. Participants will be able to correctly and accurately complete the "Activities" section, understand RAPS and triggers, utilize the MDS instruction manual and make correct decisions about assessments and revisions for care plans.

I. "Side by Side: An Intergenerational Music and Art Therapy Group and Visitation Program" - Margene Biederman*(DVS)*

This presentation explores the implementation and evaluation of an intergenerational music and art therapy group and visitation program within a long-term care facility. The role of the creative arts therapist in addressing societal issues through intergenerational programming is discussed.

10:00 - 10:30 A.M.

Break

10:30 A.M. - 12:30 P.M.

Closing Session -**"Panning for True Gold" - Dr. Leo Frangipane**

The attempt to stretch a budget, get more from less and meet one's potential is centered in perspective and attitude. Life's lessons in this regard are to be learned only as one listens, observes, and pays attention to the little things. In his years as a surgeon and caring for cancer patients, Dr. Frangipane has become the pupil, learning that attitudinal changes are life giving. Responsibility, conscious living, humor, choice, risk, intimate relationships, spirituality, uniqueness, and imagination are the keys. They make it possible for us to reach the stars and gain the priceless riches of true gold. In an anecdotal fashion, this concluding session will explore all of these tools.

12:30 P.M.

Adjournment



PENNSYLVANIA ASSOCIATION OF COUNTY AFFILIATED HOMES

17 NORTH FRONT STREET • HARRISBURG, PA 17101-1624 • (717) 232-7554 • FAX (717) 232-2162

RECEIVED

MAR 04 1999

BPOA LEGAL COUNSEL

March 3, 1999

Robert G. Cameron, Counsel
State Board of Examiners of Nursing Home Administrators
116 Pine Street
Post Office Box 2649
Harrisburg, Pa. 17105-2649

Reference No. 16A-623

Dear Mr. Cameron:

ORIGINAL: 1999
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The Pennsylvania Association of County Affiliated Homes (PACAH) appreciates the opportunity to review the Chapter 39 State Board of Examiners of Nursing Home Administrators proposed regulations. PACAH represents all 54 county and county affiliated nursing facilities in Pennsylvania with over 15,000 licensed beds. PACAH is an affiliate of the County Commissioners Association of Pennsylvania.

PACAH is pleased to offer its support for these regulations, and in particular applaud the Board with the rewrite of Sections 39.41 (relating to Provider Registration) and 39.52 (relating to Program Registration). Approval of these proposed regulations will allow provider associations to sponsor continuing education programs in a more timely manner with the most current information.

Please feel free to contact me should you need any additional information.

Sincerely,

Michael J. Wilt
Executive Director

cc: John H. Jewett, IRRC
Cathy Otto, PACAH President

RECEIVED
99 MAR -8 AM 8:57
INDUSTRIAL RELATIONS
REVIEW COMMISSION



PENNSYLVANIA ASSOCIATION OF COUNTY AFFILIATED HOMES

17 NORTH FRONT STREET • HARRISBURG, PA 17101-1624 • (717) 232-7554 • FAX (717) 232-2162

RECEIVED
99 MAR -3 P11 2:32
REVIEW COMMISSION

PACAH FAX IMPORTANT INFORMATION

TO: John Jewett, FRRC

Fax # 783-2664

FROM: Mike Wilt

DATE: 3/3/99

of pages 2

Additional information:

CHAPTER 39 SUPPORT

Please call 717 232-7554 if you do not receive the entire fax.



PENNSYLVANIA ASSOCIATION OF COUNTY AFFILIATED HOMES

17 NORTH FRONT STREET • HARRISBURG, PA 17101-1624 • (717) 232-7554 • FAX (717) 232-2162

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Legal

March 3, 1999

Robert G. Cameron, Counsel
State Board of Examiners of Nursing Home Administrators
116 Pine Street
Post Office Box 2649
Harrisburg, Pa. 17105-2649

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Michael J. Wilt
Executive Director

cc: John H. Jewett, IRRC
Cathy Otto, PACAH President

RECEIVED
99 MAR -3 PM 2:32
NURSING EXAMINER COMMISSION



J E A N N E T T E D I S T R I C T
M E M O R I A L H O S P I T A L

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99 MAR -1 AM 8:35

HOSPITAL BOARD REVIEW COMMISSION

Robert J. Bulger
President/Chief Executive Officer



February 19, 1999

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FEB 24 1999

BFOA LEGAL COUNSEL

Robert G. Cameron, Counsel
State Board of Examiners of Nursing Home Administrators
116 Pine Street
Post Office Box 2649
Harrisburg, PA 17105-2649

Dear Mr. Cameron:

In reference to the proposed amendments to the regulations relative to the continuing education requirements for licensed Nursing Home Administrators, I would like to make some comments regarding this matter. I have been a licensed Nursing Home Administrator in the State of Pennsylvania since 1980.

I am particularly concerned regarding the proposed elimination of credits for community, professional, and health care activities and the elimination of the option of credit hours on an individual basis for attendance at programs that have not had prior approval of the board. The elimination of these two options are particularly problematic for a person in my position. Because of the increasing necessity to be particularly conscious of the use of our continuing education resources, it is somewhat difficult to attend all the seminars and meetings that are appropriate in light of the constant changes in the health care field. Because I am an Administrator of a hospital based skilled nursing unit, as well as a CEO of a Hospital, I must insure that I remain current on all aspects of the health care operation. In certain cases, the programs that are important for me to attend are not always granted pre-approved continuing education approval from your organization, but I find them to be applicable to the management of a skilled nursing unit. At the same time, the necessity to attend meetings simply to get approved hours is not always the best and efficient use of the institutions time and resources.

I would also think it would be important to encourage the participation in the community, professional, and health care activities that are part of the management position. Eliminating credit for these activities may adversely impact an individual's willingness to participate.

Robert G. Cameron, Counsel
February 19, 1999
Page 2

I strongly encourage you to reconsider the elimination of these two options as I think they may have been a viable alternative to many of us.

Your attention and understanding in this matter is greatly appreciated.

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert J. Bulger". The signature is written in dark ink and is positioned above the printed name and title.

Robert J. Bulger
President/Chief Executive Officer

RJB/lv



THE HOSPITAL & HEALTHSYSTEM ASSOCIATION OF PENNSYLVANIA

RECEIVED

99 MAR 17 AM 8:49

HOSPITAL & HEALTHSYSTEM ASSOCIATION OF PENNSYLVANIA
REVIEW COMMISSION

RECEIVED

MAR 08 1999

BFOA LEGAL COUNSEL

March 5, 1999

ORIGINAL: 1999
MCGINLEY
COPIES: Jewett
Sandusky
Legal

Robert G. Cameron
Counsel

State Board of Examiners of Nursing Home Administrators
116 Pine Street, Post Office Box 2649
Harrisburg, PA 17105-2649

Re: Reference No.16A-623 (Continuing Education).

Dear Mr. Cameron:

I am writing on behalf of The Hospital & Healthsystem Association of Pennsylvania (HAP), which represents over 220 hospitals and health systems, in response to the rules proposed by the Board on continuing education requirements for licensed nursing home administrators. These hospitals and health systems own and operate over 102 long-term care facilities in the commonwealth.

We have reviewed the proposed changes to the continuing education chapter of the nursing home administrator (NHA) regulations and commend the Board for its proposals to streamline the program approval process. We do, however, have concerns about other changes proposed. Specifically:

- Requirement for Preapproval of All Programs.** We believe that this requirement is inappropriate. Many of the NHAs we represent have, in the past, obtained retroactive individual approval for programs they attended which enhanced their capability to be effective administrators. Some of these programs were state, some were national, but all included pertinent topics and excellent speakers. Although program sponsors did not seek preapproval, this did not deduct from the quality of the program nor the value of the program content. In addition, many of the most important programs with the most timely topics do not have the benefit of 60 days-plus preplanning to obtain preapproval. We believe this requirement would critically limit program choice in an environment where flexibility, not increased prescriptiveness, should be key.

Recommendation: We strongly recommend retention of the current requirement that at least 24 of the 48 biennial hours be obtained through preapproved programs.

4750 Lindle Road
P.O. Box 8600
Harrisburg, PA 17105-8600
717.564.9200 Phone
717.561.5334 Fax
<http://www.hap2000.org>

RECEIVED
99 MAR 17 AM 8:49
NURSING HOME LICENSING
REVIEW COMMISSION

Robert Cameron
March 5, 1999
Page 2

- Clock Hours and Reporting Requirements.** We believe that elimination of credit hours for community, professional and health-care activities is inappropriate. We concur with the board that these activities are worthwhile to the community and licensee, but disagree that they do not constitute education or learning that contributes directly to the professional competence of nursing home administrators. For example, NHA representatives of the HAP Council for Long-Term Care meet quarterly. In this forum they exchange ideas with one another on practices that are working and not working, on challenges and opportunities they are facing, on efforts to enhance quality and efficiency, as well as receive reports on the latest legislative, regulatory, financial, policy and quality activity in Pennsylvania, as well as across the nation. The average travel time for these meetings is four to six hours round-trip. These NHAs are taking the time to attend these meetings explicitly because the meetings enhance their administrative competence through what they learn from both their colleagues and presenters. These meetings, and other extremely beneficial meetings like them, would not qualify as a program for NHA credits under your proposal. By eliminating this option the board disregards the tremendous educational opportunities offered through networking with peers and others.

Recommendation: We strongly recommend that the opportunity to obtain limited credit hours through community, professional and health-care related activities be retained.

HAP supports continuing education requirements for NHAs as a means of promoting enhanced professional competency. However, these requirements must be flexible enough to allow NHAs to benefit from the diversity of information available through a wide variety of sources. Today's NHAs are operating in complex health care systems. Not only do they need to have the operational skills to run a nursing home, but they also need to understand how to run that nursing home in a managed care environment and as part of a full continuum of health care services offered through a system. This means that some of the most relevant programs or meetings they attend may not be specifically targeted to long-term care, but instead to the health care system, with long-term care being a part.

Robert Cameron

March 5, 1999

Page 3

NHAs today are operating their organizations under increasing pressures—financial, regulatory, and consumer. Any additional burdens added should meet the cost/benefit test, and we do not believe that these regulations do so. We strongly recommend that the Board reconsider its proposals to require preauthorization of all programs and to eliminate credit for community, professional and health-care related activities.

Thank you for the opportunity to comment. If you have any questions, please feel free to contact me at (717) 561-5325, or by e-mail, crinehart@hap2000.org.

Sincerely,

A handwritten signature in black ink that reads "Cheri Rinehart". The signature is written in a cursive, flowing style.

CHERI KROBOTH RINEHART, NHA

Vice President

Integrated Delivery Systems

CLR/dd

GUTHRIE *Troy Community Hospital*

March 2, 1999

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99 MAR -8 AM 8:57

INDEPENDENT REGULATORY
REVIEW COMMISSION

Robert G. Cameron, Counsel
State Board of Examiners of Nursing Home Administrators
116 Pine Street
Post Office Box 2649
Harrisburg, PA 17105-2649

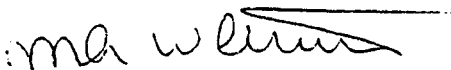
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Dear Mr. Cameron:

Please accept this letter as comment on the proposed revision of nursing home administrator relicensure requirements. I am troubled by the proposed regulations because it appears there is a narrowing of the programs and credits available to qualify for the 48 hours of continuing education biennially. As a nursing home administrator and hospital president, I have frequently used the retroactive approval of individual educational programs as well as receiving credit for community, professional and healthcare activities. The proposed regulations appear to limit the options available for credits without advancing the profession.

I am in support of streamlining and simplifying the program approval process and expansion of the credit for publication and lecture by licensees. These licensee-friendly actions by the State Board of Examiners of Nursing Home Administrators are welcome.

Sincerely,



Mark Webster
President

MW:say

pc: Cheri Rinehart, Hospital Association of Pennsylvania

Troy Community Hospital
100 John Street
Troy, Pennsylvania 17097
717-297-2121

A member of the Guthrie Healthcare System



GREENE COUNTY MEMORIAL HOSPITAL

WAYNESBURG, PENNSYLVANIA 15370

412-627-3101

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99 MAR -1 AM 8:35

Robert G. Cameron, Counsel
State Board of Examiners of Nursing Home Administrators
116 Pine Street
Post Office Box 2649
Harrisburg, PA 17105-2649

PROFESSIONAL REGISTRATION
REVIEW COMMISSION

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Dear Mr Cameron;

In regards to the State Board of Examiners of Nursing Home Administrators proposal to amend regulations relative to continuing education requirements, I am asking the board to reconsider. Although I agree that the process is in need of streamlining, I do not feel that elimination of credit for community , board and committee involvement is an appropriate mechanism to accomplish this goal.

Many Administrators are very active in organizations which directly impact residents of long term care facilities. The issues addressed in community based organizations are those that most directly impact the residents of long term care in their own area, such as recreational and social activities and facilities. In addition , participation in national organizations affords administrators an opportunity to impact the long term care industry environment, to learn from one another and to share ideas.

Rather than eliminate those options for credit, why not set a number of credits that can be applied to membership or leadership of local, regional , or national organizations (x number credits per meeting) with the stipulation of producing supporting documents to verify participation (meeting minutes, sign in sheets, etc) upon request by the board. In addition a limit could be set for the number of credits which can be accumulated in this manner, similar to current practice, without the requirement to have a review board for each individual submission. Similarly, credits for programs, seminars, or lectures could be granted for those which award credits in another category (such as Social Work, Nursing, Medicine, Health Care Administration) AND which address specified issues of long term care (end of life decision making, ethics of care, restraints, dignity) and carry the same stipulation of proof of participation on request.

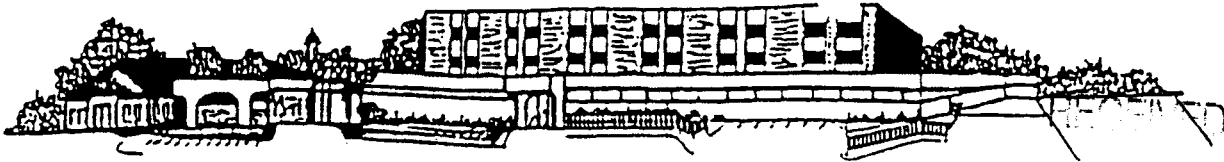
As an administrator in a rural area, attendance at a formal approved conference means traveling 1 to 2 hours each way and spending in the neighborhood of \$200.00 for 8 credits, 6 times over a 2 year period. With Medicare reimbursement changes, these are costs which are non reimbursed and place a financial burden on the facility.

Thank you very much for the opportunity to comment.

Sincerely yours,

Barbara Girod, BSN, NHA

Barbara Girod, BSN NHA
Administrator, Skilled Nursing Unit
Greene County Memorial Hospital
350 Bonar Avenue
Waynesburg, PA 15370
724 627-2550



THE ELLWOOD CITY HOSPITAL

724 Pershing Street, Ellwood City, PA 16117
(724) 752-0081
FAX (724) 752-0966

99 MAR 17 AM 8:49

STATE BOARD OF NURSING HOME ADMINISTRATION
REVIEW COMMISSION

Herbert S. Skuba
President

March 4, 1999

Robert G. Cameron, Counsel
State Board of Examiners of Nursing Home Administrators
116 Pine Street, P.O. Box 2649
Harrisburg, PA 17105-2649

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MAR 08 1999

BPOA LEGAL COUNSEL

Dear Mr. Cameron:

These comments are written as Public Comments in response to the Pennsylvania State Board of Examiners of Nursing Home Administrators' proposal to amend its regulations 39.1, 39.11, 39.14, 39.41, 39.43, 39.5-39.61 and to delete 39.31 and 39.32, 39.42 and 39.62-39.64 and to add 39.44 and 39.65.

As a former member and Chairman of the Pennsylvania State Board of Examiners of Nursing Home Administrators, I can thoroughly understand the rationale behind the proposed changes. However I do feel that certain programs that do not receive pre-approval are extremely beneficial as those programs most often are relevant to current issues. Because of this it may be the best interest of the licensee to remain able to obtain retroactive (presently 002) credit for certain current valuable additions to their individual knowledge base.

Some programs requiring pre-approval unfortunately are either no longer relevant as the immediacy of the issue has long passed or many are frankly the same program that has been presented all too often previously. The programs, especially those in the personnel administration areas, are many times redundant with little changed except the program title and perhaps a few stories and/or anecdotes.

At one time members of the Board of Examiners were each required to attend two (2) pre-approved programs annually in an attempt to monitor the content validity and attendance requirements. Following such monitoring a written report was required at the next regularly scheduled Board meeting. There was to be no charge for the Board members attendance nor was the member entitled to receive any continuing education credit for the same. Is this still a policy? If not, my suggestion is that the Board of Examiners consider reinstating the same as an effective tool toward assuring the continuance of high quality continuing education programs.

I thank you for the opportunity to express my views and present my suggestions.

Respectfully,

Herbert S. Skuba, NHA 001215-L
President/CEO

The Ellwood City Hospital and the Mary Evans Extended Care Center



GRAND VIEW HOSPITAL

February 22, 1999

Mr. Robert G. Cameron, Counsel
State Board of Examiners of Nursing
Home Administrators
PO Box 2649
Harrisburg, PA 17105-2649

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IDENTIFICATION
REVIEW COMMISSION

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FEB 25 1999

BPOA LEGAL COUNSEL

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SELLERSVILLE, PA 18960
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RE: Proposed Revision of Nursing Home Administrator Relicensure Requirements

Mr. Cameron:

I am writing to express my *strong opposition* the proposed plan to limit NHA continuing education credit to those programs that are pre-approved, and to eliminate the option of receiving credit for professional health related board or organization involvement.

Many licensed Nursing Home Administrators are actively involved in professional health related boards and organizations through which those individuals receive more pertinent, more timely and better opportunities for education than is garnered through many "pre-approved" courses. These individuals put in many hours of effort that benefit not only themselves, but also the field of Nursing Home Administration and those residents / clients for whom NHA's are responsible.

To eliminate the option of applying for CE credits for efforts that pertain to health related board or organization involvements will increase costs, eliminate an incentive for NHA's to become involved in professional activities, and result in a decline in the overall quality of the NHA credential. Please endeavor to prevent the proposed change from being enacted into regulation.

Thank you very much.

Sincerely,

Joanne Lee, NHA