

"The future of long term care"



Pennsylvania Health Care Association

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RECEIVED
7/13 MAR -9 AM 8:33
INDEPENDENT REGULATORY
REVIEW COMMISSION

Original: 2469
March 7, 2006

Ms. Christina Stuckey
Administrative Assistant
State Board of Examiners of Nursing Home Administrators
P.O. Box 2649
Harrisburg, PA 17105-2649

RE: Final Regulation #16A-6210 (#2469), Biennial Renewal Fees

Dear Ms. Stuckey:

On behalf of more than 200 nursing home members of the Pennsylvania Health Care Association we certainly understand the State Board of Examiners of Nursing Home Administrators' financial position and the need for increased revenues. However, we believe that such a dramatic increase to the nursing home administrator renewal fee is coming at precisely the wrong time for the long term care community.

The number of individuals entering into the administrator profession is decreasing at a time when the demand for them is increasing. Consequently, any additional barriers to the supply of administrators, such as a 175% increase in the renewal fees in one year, should be avoided.

We question why the State Board feels it is necessary to increase the fee above the level that is required to eliminate the current deficit. It is our understanding that the reason for such a dramatic increase this year was partly due to the difficult and lengthy process for obtaining a fee increase in the future. We agree with the comments of the Independent Regulatory Review Commission, however, and would support phasing in the increase over a period of eight to ten years. This would afford nursing homes administrators a better chance of absorbing the increase.

Thank you for the opportunity to comment on the proposed regulations. If you have any questions or wish to discuss this further, please do not hesitate to contact me.

Sincerely,

Anne Wantz
Interim CEO

cc: ✓ Mr. John Jewett, IRRC
The Honorable Robert M. Tomlinson
The Honorable Lisa M. Boscola
The Honorable Thomas P. Gannon
The Honorable William W. Rieger

Gelnett, Wanda B.

From: IRRC
Sent: Wednesday, March 29, 2006 3:24 PM
To: Gelnett, Wanda B.
Subject: FW: Regulation #16A-6210

Kris

-----Original Message-----

From: Crawford, Teresa [mailto:1crawford@co.washington.pa.us]
Sent: Wednesday, March 29, 2006 2:42 PM
To: IRRC
Subject: Regulation #16A-6210

To Whom It May Concern,

Reference #16A-6210 (Biennial Renewal Fees)

This is in regards to the proposed rule to increase the NHA licensure fee. I strongly object to this proposed rulemaking, and urge the Independent Regulatory Review Commission to reject the above referenced proposed regulation.

At present I am not actively serving as an Administrator but as a Director of Nursing of a nursing facility. Many Directors of Nursing hold Administrator license but many of them would not renew their license or decide to become Administrators due to the increase fee. It is a benefit to the facility to have two licensed persons in case of an emergency but an increase in fees would eliminate that benefit

I strongly urge you to reject the proposed rulemaking.

Thank you for your time and consideration of this matter.

Teresa Crawford, R.N. B.S.N. N.H.A

Director of Nursing
Washington County Health Center

Original: 2469

Gelnett, Wanda B.

From: IRRC
Sent: Thursday, March 23, 2006 3:47 PM
To: Gelnett, Wanda B.
Subject: FW: Reference No. 16A-6210 (#2469) (Biennial Renewal Fees)

Importance: High

Kris

-----Original Message-----

From: Peck, Marlin [mailto:MLPeck@york-county.org]
Sent: Thursday, March 23, 2006 3:46 PM
To: IRRC
Cc: Wilt Mike (E-mail); Stephanie Zweitzig (E-mail)
Subject: Reference No. 16A-6210 (#2469) (Biennial Renewal Fees)
Importance: High

Mr. John R. McGinley, Jr. (via email: irrc@irrc.state.pa.us)
Chairman, Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, Pa. 17101

Dear Chairman McGinley:

I have been a licensed Nursing Home Administrator since October, 1986 and I strongly urge the Independent Regulatory Review Commission to reject the above referenced proposed regulation.

I strongly object to this proposed final-form regulation, which seeks a 175 % increase in the biennial renewal fees for licensed nursing home administrators. This is an excessive request and I would suggest consideration of a smaller increase combined with a more stringent review of the State Board of Examiners of Nursing Home Administrators operating budget.

The State Board estimates that there are 1,826 licensed nursing home administrators, which represents a decrease of 400 in the past five years. The Board also knows that a number of licensed administrators are not actively serving as the Administrator of a licensed nursing home, but may be involved in other long-term care activities such as assisted living, consultants, nursing home associations, or other entities that do not require a current license. The expertise and guidance available to my facility by these individuals on a daily basis is invaluable when considering the constant clinical and financial regulatory changes that can have a negative impact on our abilities to operate in an efficient and effective manner.

The imposition of such a large increase will surely result in a number of those health-care professionals deciding not to renew their license, and thus deny our facility access to consultants and professionals with whom we are comfortable in knowing of their continuing educational status. This failure to renew will also serve to worsen the budgetary issues that the State Board is now facing.

The Department of Public Welfare (DPW) has implemented a cap on Medicaid payment increases to nursing homes to a maximum 2.8% increase effective on July 1, 2005. The irony of DPW proposing a 2.8% cap while the State Board of Examiners proposes a 175% increase in fees should not go unnoticed.

Perhaps in this day of over regulation of nursing homes and nursing home administrators, the State Board should examine its expenses in the areas of enforcement and investigation,

legal office expenses and legislative and regulatory analysis. If nursing homes have to live and operate and provide quality care on declining financial resources, then the oversight agencies should follow the same mandates.

I appreciate the opportunity to comment on these final-form regulations, and once again urge you to reject them. Please feel free to contact me should you have any questions on this matter.

Sincerely,

Marlin L. Peck, NHA, Administrator
mlpeck@york-county.org
Pleasant Acres Nursing & Rehab Ctr
118 Pleasant Acres Road
York, PA 17402
717-840-7103
717-840-7414 (fax)

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Original: 2469



The Rouse Home

701 Rouse Avenue, Youngsville, Pennsylvania 16371
(814) 563-7565 Fax (814) 563-9049

March 23, 2006

Mr. John R. McGinley, Jr.
Chairman, Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, Pa. 17101

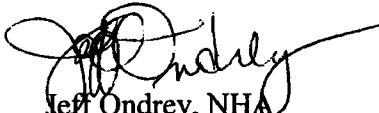
Reference No. 16A-6210 (#2469) (Biennial Renewal Fees)

Dear Chairman McGinley:

I have been a PA licensed nursing home administrator since 1992, with a brief period being unlicensed while I resided in the State of Mississippi. In April of this year I will be assuming the position of administrator in a New York State facility. The biannual licensing fee in New York State is only \$40.00. I would consider keeping my PA license active; however, since the rates are anticipated to increase by 175%, it is unlikely that I will do so. I anticipate that there are many others in PA who possess an active license but are not currently active administrators. Many of these will likely not renew their license either, potentially leaving the Board with less revenue than planned as a result of this drastic increase.

Given the continual cutting back that nursing home administrators have had to deal with over the past several years with costs escalating in all spheres, it seems ironic that the Board would make such a dramatic increase at this time. I would recommend that the IRRC send this rate increase back to the Board of Nursing Home Examiners for revision to a more moderate increase.

Sincerely,


Jeff Ondrey, NHA
Administrator

RECEIVED
2006 MAR 28 AM 9:11
INDEPENDENT REGULATORY
REVIEW COMMISSION

Original: 2469

Gelnett, Wanda B.

From: IRRC
Sent: Thursday, March 23, 2006 9:13 AM
To: Gelnett, Wanda B.
Subject: FW: Regulation 16A-6210

ris

---Original Message-----

rom: Mike Wilt [mailto:MWILT@pacounties.org]
ent: Thursday, March 23, 2006 9:01 AM
o: IRRC
c: Jewett, John H.
ubject: Regulation 16A-6210

March 22, 2006

Mr. John R. McGinley, Jr.
Chairman, Independent Regulatory Review Commission
33 Market Street
4th Floor
Harrisburg, Pa. 17101

Reference No. 16A-6210 (#2469) (Biennial Renewal Fees)

Dear Chairman McGinley:

The Pennsylvania Association of County Affiliated Homes (PACAH) urges the Independent Regulatory Review Commission to reject the above referenced proposed regulation. PACAH represents county and county affiliated nursing facilities in Pennsylvania and their respective nursing home administrators. PACAH is an affiliate organization of the County Commissioners Association of Pennsylvania.

PACAH strongly objects to this proposed final-form regulation, which seeks a 175 %increase in the biennial renewal fees for licensed nursing home administrators. This is an excessive request and PACAH requests a smaller increase combined with a more stringent review of the State Board of Examiners of Nursing Home Administrators operating budget. The State Board estimates that there are 1,826 licensed nursing home administrators, which represents a decrease of 400 in the past five years. The Board also knows that a number of licensed administrators are not actively serving as the Administrator of a licensed nursing home, but may be involved in other long-term care activities such as assisted living, consultants, nursing home associations, or other entities that do not require a current license. The imposition of such a large increase will surely result in a number of those health-care professionals deciding not to renew their license, thus making their budget worse instead of better for the State Board.

The Department of Public Welfare (DPW) has implemented a cap on Medicaid payment increases to nursing homes to a maximum 2.8% increase effective on July 1, 2005. The irony of DPW proposing a 2.8% cap while the State Board of Examiners proposes a 175% increase in fees should not go unnoticed.

3/23/2006

Perhaps in this day of over regulation of nursing homes and nursing home administrators, the State Board should examine its expenses in the areas of enforcement and investigation, legal office expenses and legislative and regulatory analysis. If nursing homes have to live and operate and provide quality care on declining financial resources, then the oversight agencies should follow the same mandates.

PACAH appreciates the opportunity to comment on these final-form regulations, and once again urges you to reject them. Please feel free to contact me should you have any questions on this matter.

Sincerely,

Michael J. Wilt
Executive Director.

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Original: 2469

Gelnett, Wanda B.

From: Jewett, John H.
Sent: Monday, March 13, 2006 8:28 AM
To: IRRRC
Cc: Gelnett, Wanda B.; Sandusky, Richard M.; Wyatte, Mary S.; Kim Kaufman; Shomper, Kris
Subject: FW: Biennial Renewal Fees

This email and its attachment are from the Pennsylvania Association of Affiliated County Homes (PACAH) and should be filed under "final comments" for file #2469.

-----Original Message-----

From: Mike Wilt [mailto:MWILT@pacounties.org]
Sent: Sunday, March 12, 2006 11:53 AM
To: Jewett, John H.
Cc: Stuckey, Christina
Subject: Biennial Renewal Fees

Enclosed is a copy of correspondence that was sent to the Majority and Minority Chairs of the House Professional Licensure Committee.

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3/13/2006

Original: 2469

RECEIVED

2006 MAR 13 AM 10: 29

INDEPENDENT REGULATORY
REVIEW COMMISSION

March 10, 2006

The Honorable William W. Rieger
Minority Chair House Professional Licensure Committee
House Post Office
Harrisburg, Pa. 17120

Reference No. 16A-6210 (#2469) (Biennial Renewal Fees)

Dear Representative Rieger:

The Pennsylvania Association of County Affiliated Homes (PACAH) urges the House Professional Licensure Committee to reject the above referenced proposed regulation. PACAH represents county and county affiliated nursing facilities in Pennsylvania and their respective nursing home administrators. PACAH is an affiliate organization of the County Commissioners Association of Pennsylvania.

PACAH strongly objects to this proposed final-form regulation, which seeks a 175 %increase in the biennial renewal fees for licensed nursing home administrators. This is an excessive request and PACAH requests a smaller increase combined with a more stringent review of the State Board of Examiners of Nursing Home Administrators operating budget. The State Board estimates that there are 1,826 licensed nursing home administrators, which represents a decrease of 400 in the past five years. The Board also knows that a number of licensed administrators are not actively serving as the Administrator of a licensed nursing home, but may be involved in other long-term care activities such as assisted living, consultants, nursing home associations, or other entities that do not require a current license. The imposition of such a large increase will surely result in a number of those health-care professionals deciding not to renew their license, thus making their budget worse instead of better for the State Board.

The Department of Public Welfare (DPW) has implemented a cap on Medicaid payment increases to nursing homes to a maximum 2.8% increase effective on July 1, 2005. The irony of DPW proposing a 2.8% cap while the State Board of Examiners proposes a 175% increase in fees should not go unnoticed.

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provide quality care on declining financial resources, then the oversight agencies should follow the same mandates.

PACAH appreciates the opportunity to comment on these proposed regulations, and once again urges you to reject them. Please feel free to contact me should you have any questions on this matter.

Sincerely,

Michael J. Wilt
Executive Director.