

Christina Stuckey
State Board of Nursing Home Examiners
P.O.Box 2649
Harrisburg, PA 17105

RECEIVED
2005 MAY 17 AM 9:16

April 29, 2005

REVENUE COMMISSION

Dear Ms. Stuckey:

This letter is in response to the proposed regulations to amend the NHA license renewal fees from \$108 to \$297.

I have concerns regarding this proposed amendment as follows:

1. The increase is more than double the current fee which is a tremendous increase at one time. I would have to wonder why the board had not been better monitoring their own practices to anticipate such a need.
2. The proposed fee is higher than 4 contiguous states and lower than 2 others. Have the average NHA wages also been reviewed and compared in the 2 lower states? Have the number of nursing homes in those states been compared with PA?
3. The proposed fee of \$297 is a hardship for a large number of the NHA's in the state because they maintain their own license renewal without any reimbursement by the employer or are not directly employed to receive any reimbursement. In addition to maintaining the fee renewals the NHA's are also obligated to maintain current licensure status by obtaining the required number of credit hours. A large number of NHA's must pay for their continuing education costs. This obviously adds on to the burden.
4. If this proposed fee is passed, I fear that even more current NHA's will not renew due to the cost. The nursing facilities will suffer because there is a need for interim NHA's in several different situations across the state. There is also a small pool of retired NHA's that maintain their licensure status so that they can accept short term temporary NHA assignments. The fee and the education requirements would further deplete this pool.
5. There is a large number of NHA's that are also Registered Nurses who maintain their nursing licenses also. This cost is usually not reimbursed. This adds on to the NHA costs.

The current enforcement environment that the NHA's must work in is a daily struggle laden with high stress and long hours. It is difficult to find and keep good NHA's as many are leaving the field for other options. Raising the renewal rate at more than double the current rate is just not conducive to maintaining the NHA's that we do have. In my opinion, if you raise the rate as proposed, you will lose even more as there will be an increase in declining numbers of NHA's. Personally, I would not be able to maintain

MAY - 1 2005

my current licensure status if I did not have an employer to reimburse me for all the costs associated with maintaining it.

Sincerely,

Marcella E. Stoup, RN, NHA.

Marcella E. Stoup, RN, NHA

Original: 2469



RECEIVED

2005 JUN -3 PM 12: 23

RENEWAL COMMISSION

**VALENCIA WOODS
NURSING CENTER**

85 Charity Place

Valencia, PA 16059

April 28, 2005

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

Dear Ms. Stuckey:

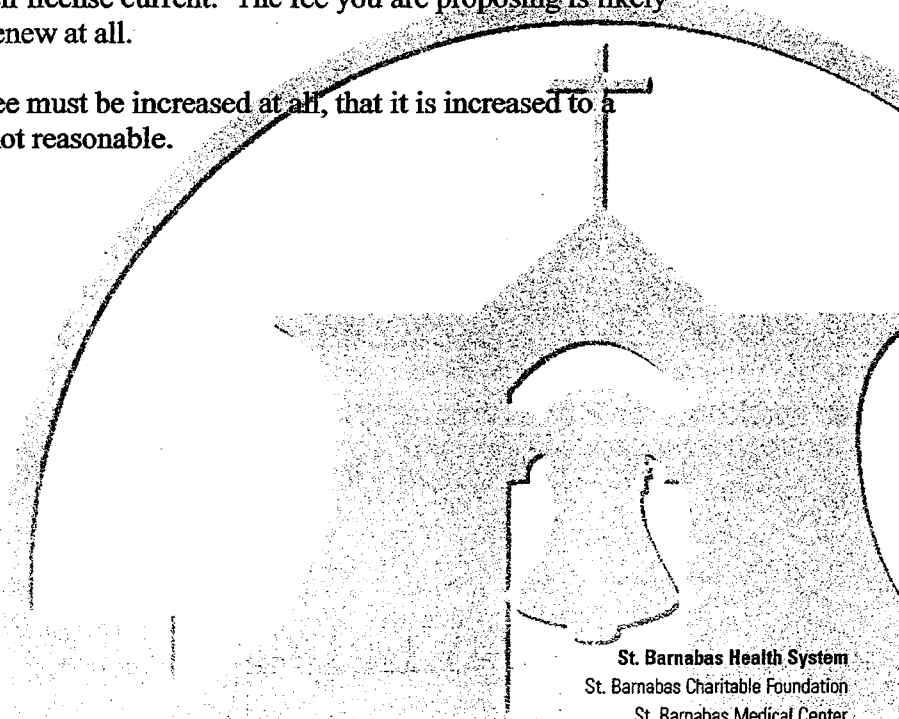
The reason for my letter is in regards to the proposed increase in the biennial license fee for nursing home administrators. An increase of 175% is unacceptable.

I understand the reason for this increase is the reduction in the number of licensed administrators. An increase such as what is being proposed is only likely to decrease this number even further. There are many licensed administrators in the state who are not active administrators, yet keep their license current. The fee you are proposing is likely to cause these individuals to not renew at all.

I am asking that if this licensing fee must be increased at all, that it is increased to a reasonable fee. A fee of \$297 is not reasonable.

Sincerely,

Karen Russell
Administrator



MAY - 1 2005

St. Barnabas Health System
St. Barnabas Charitable Foundation
St. Barnabas Medical Center
St. Barnabas Nursing Home
The Arbors at Valencia Woods
The Village at St. Barnabas
The Washington Place at St. Barnabas
The Woodlands at St. Barnabas



**VALENCIA WOODS
NURSING CENTER**

85 Charity Place

Valencia, PA 16059

April 28, 2005

RECEIVED
2005 MAY 17 AM 9:16

REVIEW COMMISSION

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

Dear Ms. Stuckey:

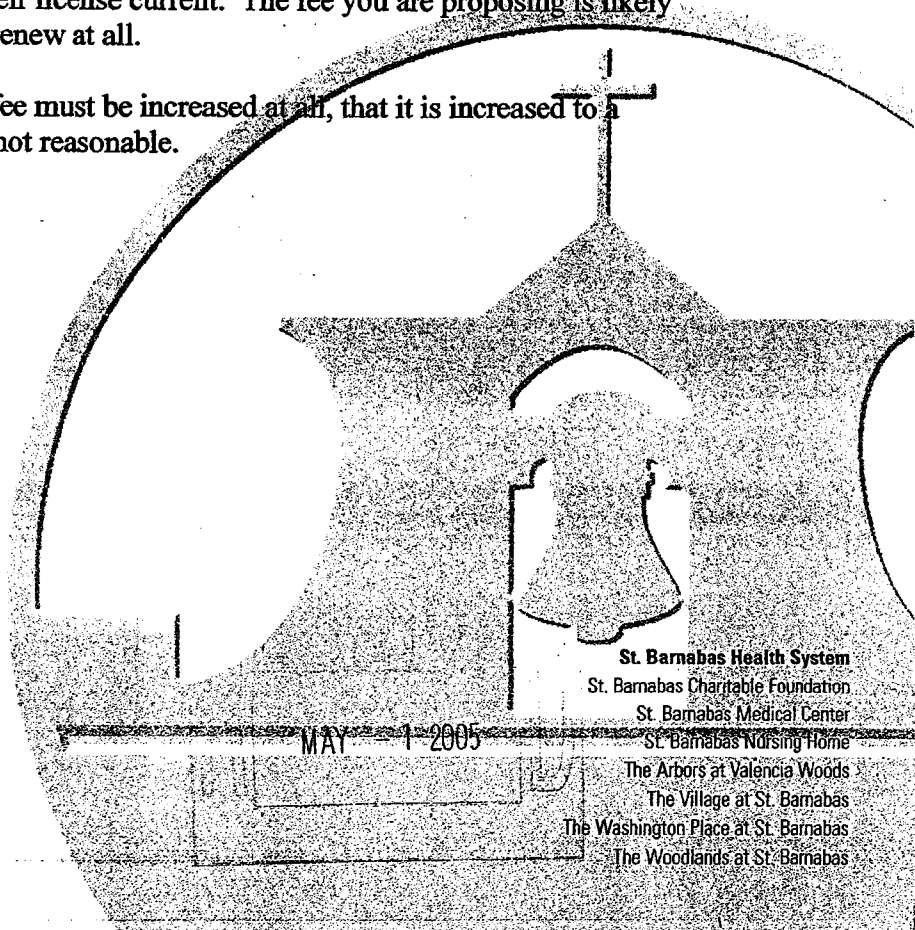
The reason for my letter is in regards to the proposed increase in the biennial license fee for nursing home administrators. An increase of 175% is unacceptable.

I understand the reason for this increase is the reduction in the number of licensed administrators. An increase such as what is being proposed is only likely to decrease this number even further. There are many licensed administrators in the state who are not active administrators, yet keep their license current. The fee you are proposing is likely to cause these individuals to not renew at all.

I am asking that if this licensing fee must be increased at all, that it is increased to a reasonable fee. A fee of \$297 is not reasonable.

Sincerely,

Karen Russell
Administrator



St. Barnabas Health System
St. Barnabas Charitable Foundation
St. Barnabas Medical Center
St. Barnabas Nursing Home
The Arbors at Valencia Woods
The Village at St. Barnabas
The Washington Place at St. Barnabas
The Woodlands at St. Barnabas

IRRC

From: Pastorius, Nancy [PastoriusNL@upmc.edu]
Sent: Monday, May 23, 2005 8:34 AM
To: IRRC
Subject: NHA Fee Increase

To Whom It May Concern:

The dramatic increase in the fee for a Nursing Home Administrator license is unreasonable. The reason for the increase is even more absurd. Increasing the fee because there are fewer licenses doesn't make for anyone wanting to obtain a NHA license. What if the number of new licenses dramatically increased, would we see a decrease in the fee? Probably not. I just wanted to express my objection to the AMOUNT of the increase, some increase is acceptable but not one of this proportion.

Sincerely,
Nancy Pastorius

2005 MAY 23 7:16:50
PASTORIUS, NANCY
PASTORIUS, NANCY

5/23/2005

Original: 2469
IRRC

From: Jeff Ondrey [jeff_ondrey@rouseestate.org]
Sent: Wednesday, May 18, 2005 4:52 PM
To: IRRC
Subject: Nursing Home Administrator License fee increase

I would like to object to the proposed exorbitant increase in the Nursing Home Administrator Licensing renewal fee. In an age where we, as administrators are called upon to continue to meet the regulatory demands of the nursing home industry in a climate of decreased reimbursements and increased costs, it is ironic and disappointing to have to deal with yet another significant blow. The availability of licensed nursing home administrators continues to shrink in Pennsylvania because of these factors, and I suspect this proposal will simply add others to the list of those who are leaving the field.

Please consider making any increase more in line with inflationary costs and join the real world that we live in on a daily basis and look for areas in the licensing board that can be eliminated or cut back in order to lower the board's costs.

Thank you for the opportunity to comment.

Jeff Ondrey, Administrator

The Rouse Home

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RECEIVED
2005 MAY 19 AM 8:28
Jeffrey Ondrey

5/19/2005

Thomas C. Ceraso
Commissioner

Tom Balya
Chairman

Phil Light
Commissioner

Original: 2469



MARGARET C. HARPER
Administrator
Phone: (724) 830-4000
TDD (724) 830-3802
Fax: (724) 830-4074

Westmoreland Manor
2480 S. Grande Blvd.
Greensburg, PA 15601

May 19, 2005

Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, PA 17105

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

Dear Sir or Madam:

I urge the Independent Regulatory Review Commission to reject the above referenced proposed regulation. I am a licensed Nursing Home Administrator.

I strongly object to this proposed rulemaking, which seeks a 175% increase in the biennial renewal fees for nursing home administrators. This is an excessive request and PACAH requests a small increase combined with a more stringent review of your 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 the budget worse instead of better for the State Board.

The Department of Public Welfare (DPW) has proposed to cap any Medicaid increases in payment rates to nursing homes to a 2% increase over this year's rate on July 1, 2005. The irony of DPW proposing a 2% 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

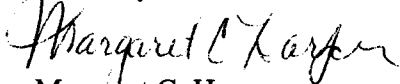
May 19, 2005

Page Two

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

I appreciate the opportunity to comment on these proposed regulations, and respectfully ask that they be withdrawn and resubmitted with a more realistic fee increase and Board budget. Please feel free to contact me should you have any questions on this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Margaret C. Harper".

Margaret C. Harper
Administrator

Original: 2469

IRRC

From: Teresa Hessler [THessler@completehealthcareresources.com]
Sent: Wednesday, May 18, 2005 8:30 PM
To: IRRC
Subject: Fee

I object to the proposed rate increase for licensure renewal. This is another obstacle to an increasingly difficult career.

Teresa Hessler MS, NHA

Administrator

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RECEIVED
2005 MAY 19 AM 8:28
Teresa Hessler

5/19/2005

Original: 2469

IRRC

From: Marvin Granda [gdal2amg@fast.net]
Sent: Tuesday, May 17, 2005 4:02 PM
To: IRRC
Subject: NHA License Fee Increase

Dear Gentlemen,

Please accept my comments concerning the proposed increase to the Nursing Home Administrator license fee. I believe a 275% increase is exorbitant especially when considering the proposed budget caps long term care nursing reimbursement at 2%. Further, I don't believe a 275% increase is any enticement to increase the ranks that saw a decrease of 400 licenses over the past 5 years.

Thank you for hearing my comments.

Marvin Granda, NHA

RECEIVED
MAY 17 PM 4:15
NORTH CAROLINA

5/17/2005



Original: 2469

Crawford County Care Center

20881 State Hwy. 198
Saegertown, PA 16433

Noreen Lee, R.N., N.H.A.
Administrator

17

Morris W. Waid
County Commissioner
Jack M. Preston
County Commissioner
Roger C. Williams
County Commissioner
Dr. Ronald M. Unice
Medical Director

May 17, 2005

Independent Regulatory Review Commission
333 Market St., 14th Floor
Harrisburg, Pa. 17101

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

Dear Sir or Madam:

I am writing to comment on the above referenced proposed regulations.

I object to this proposed rulemaking. As a licensed nursing home administrator this is an excessive increase for nursing home administrators in small facilities. Salaries of nursing home administrators are widely diverse usually based on facility size. Salaries are double or more in larger facilities. It seems inequitable to base this huge increase universally to all.

I personally have two friends that are licensed nursing home administrators but are not currently working in this capacity. They have maintained their licenses but have stated they will not, or will put them in escrow if this increase occurs. I'm sure this will be true of others as well which will further decrease the number of administrators and ultimately your budgeted income. With proposed caps on payment and consequently salaries it seems that this huge increase is not appropriate at this time.

Please reconsider these regulations and resubmit with a much lesser increase.
Thank you for your consideration.

Respectfully,

Noreen Lee, RNC, NHA
Administrator

RECEIVED
MAY 23 11:55
HARRISBURG, PA

Original: 2469

Silver, Roberta

From: Stuckey, Christina
Sent: Tuesday, May 17, 2005 9:47 AM
To: Silver, Roberta
Subject: FW: NHA fee increase

Hi Roberta: Here is an e-mail comment to the fee increase. I also received three other comments. I will bring them up to you this morning. Thanks!

Chris

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

From: Park, Rebecca
Sent: Monday, May 16, 2005 11:08 AM
To: Stuckey, Christina
Subject: NHA fee increase

I am writing to let you know that I am totally against such an exorbitant increase in our renewal fee! How can this type of increase ever be justified? I hope that clearer heads will prevail and they will understand that it is difficult to be an administrator, and with type of increase many of us may decide it is just not worth the effort anymore—I don't think the state can afford to loose good people—

Rebecca J. Park RN,NHA
Commandant
PA. Soldiers & Sailors Home
PO. Box 6239
Erie, PA. 16512-6239
814-878-4926
814-871-4617 fax

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2005 JUN -3 PM 12:22
RECEIVED
NATIONAL ARCHIVES

5/17/2005

Original: 2469
IRRC

From: Crawford, Teresa [1crawfort@co.washington.pa.us]
Sent: Monday, May 16, 2005 3:08 PM
To: IRRC
Subject: Increase in Nursing Home Administrators license fees

I am writing to inform someone that I disagree with increasing the biennial fee for Nursing Home Administrators. I am a fairly new administrator but presently not practicing as I am a Director of Nursing. Increasing the fee for license will discourage new people into the profession and you will lose older professionals who renew just to maintain license.

Teresa Crawford, R.N. B.S.N. N.H.A. License #NH006220

RECEIVED
2005 MAY 17 AM 9:23
Nursing Home Administrators

5/17/2005

Original: 2469

(4)

IRRC

From: Park, Rebecca [rpark@state.pa.us]
Sent: Monday, May 16, 2005 11:05 AM
To: IRRC
Subject: NHA rate increase

The proposed rate increase is absurd! How can they justify such an exorbitant increase—I am totally and completely against it? It is difficult enough being an administrator, but to add this monumental increase on top of everything else we contend with, with no justification or increase in services we could or should expect—I hope you will not allow this to go through.

Rebecca J. Park RN,NHA
Commandant
PA. Soldiers & Sailors Home
PO. Box 6239
Erie, PA. 16512-6239
814-878-4926
814-871-4617 fax

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5/16/2005

IRRC

From: Langguth, David [dlangguth@state.pa.us]
Sent: Monday, May 16, 2005 12:05 PM
To: IRRC
Subject: NHA Licensure fee increase

Importance: High
Sensitivity: Personal

What type of anti-logic is being used to increase NHA licensure fees in the amount of \$189.00? Although it might be customary and acceptable to all professionals to realize a slight fee increase due to inflationary or administrative measures, I fail to comprehend that licensure trends demand such an outrageous and exorbitant figure of \$297.00! In return, what do we, as licensed NHAs receive? The right to continue working in the ludicrously regulated, highly penalized arena of Long-Term Care? The right to be responsible for other staff who jeopardize our credentials? What has been witnessed within the past two years is continued erosion of those who desire to continue working in a profession that once had reasonable fees and purpose, as well as those who have no motivation to be employed in long-term care, and this additional deterrent is being introduced into the scenario? Whatever the strategy, it certainly appears to be an attempt to further decimate ranks already depleted, or a poorly aimed shot at the wrong bull's-eye in a system with other components that need targeted. If there is a rationale to this oppressive increase, NHA's need to be fully informed of that thought process (and of its benefits) but, more importantly, how such an action will enhance an industry in need of professionals who already experience major disparity with licensure fees when compared to job satisfaction, motivation, economic reward, and protection from regulatory imperialism. The licensure fee increase is unacceptable, professionally devastating, and beyond comprehension.

David J.

Langguth

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DuBois
Nursing
Home

A New Vision in Healthcare

200 S. 8th Street, PO Box 307 DuBois, PA 15801



tel 814.375.9100

fax 814.375.3979

2005 JUN -3 PM 12:23

REVIEW COMMISSION

May 16, 2005

Christine Stuckey
State Board of Examiners of Nursing Home Administrators
P.O. Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Stuckey,

Please enter my objection to the proposed 275% increase in the NHA biennial licensure renewal fee. Such an increase is unconscionable in any setting and does not reflect any increase in "value" received by anyone using the system. Thank you.

Sincerely,

Gary A. Peters, MHA, NHA
Administrator
DuBois Nursing Home

MAY 18 2005



PENNSYLVANIA ASSOCIATION OF COUNTY AFFILIATED HOMES

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

Original: 2469

May 11, 2005

Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, Pa. 17101

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

Dear Sir or Madam:

The Pennsylvania Association of County Affiliated Homes (PACAH) urges the Independent Regulatory Review Commission to reject the above referenced proposed regulation. PACAH represents all 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 rulemaking, 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 proposed to cap any Medicaid increases in payment rates to nursing homes to a 2% increase over this year's rate on July 1, 2005. The irony of DPW proposing a 2% 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



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AN AFFILIATE OF THE COUNTY COMMISSIONERS ASSOCIATION OF PENNSYLVANIA

WWW.PACOUNTIES.ORG

Email - mwilt@pacounties.org

Email - szweitzig@pacounties.org

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.

PACAH**PENNSYLVANIA ASSOCIATION
OF COUNTY AFFILIATED HOMES**

17 NORTH FRONT STREET • HARRISBURG, PA 17101-1624 • (717) 232-7654 • FAX (717) 232-2162

Fax Transmission Cover SheetTO: IRRC

LOCATION: _____

FAX No.: 717-783-2664FROM: PACAHDATE: 5/12/05# of PAGES: 3 (Including Cover Sheet)

COMMENTS:

2005 MAY 12 AM 10:05
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COMMISSION

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AN AFFILIATE OF THE COUNTY COMMISSIONERS ASSOCIATION OF PENNSYLVANIA
WWW.PACOUNTIES.ORG



Washington County Health Center

36 Old Hickory Ridge Road, Washington, PA 15301
Phone: (724) 228-5010

Original: 2469

May 12, 2005

Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, PA 17101

Reference # 16A-6210 (Biennial Renewal Fees)

To Whom It May Concern,

This letter is in regards to the above referenced proposed rule increasing 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, which seeks a 175 %increase in the biennial renewal fees for licensed nursing home administrators.

This is an excessive request, and should be revised to a much smaller and more reasonable fee 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, a decrease of 400 in the past five years. The imposition of such a large increase will surely result in the decision of a large number a number of licensed administrators, who are not actively serving as the Administrator of a licensed nursing home, to not renew their license. This will make the State Board's budget worse instead of better.

The Department of Public Welfare (DPW) has proposed to cap any Medicaid increases in payment rates to nursing homes to a 2% increase over this year's rate on July 1, 2005. The irony of DPW proposing a 2% cap while the State Board of Examiners proposes a 175% increase in fees should not go unnoticed. 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 proposed regulations, and once again urge you to reject them. Please feel free to contact me should you have any questions on this matter.

Sincerely,

Alvin W. Allison, Jr.
Administrator

c: Mike Wilt
File

A SERVICE AGENCY OF WASHINGTON COUNTY

Larry Maggi
Co-Chairman

J. Bracken Burns, Sr.
Co-Chairman

Diana L. Irey
Commissioner



Original: 2469

2825 Oakwood Drive
Harrisburg, PA 17110

May 9, 2005

2005 JUN -3 PM 12: 23

Christina Stuckey, Administrator, State Board of Examiners of Nursing Home Administrators

P. O. Box 2649

Harrisburg, PA 17105-2649

Dear Ms. Stuckey:

This letter is with regard to the State Board of Examiners of Nursing Home Administrators proposed regulations to amend § 39.72 (relating to fees) to increase the biennial license renewal fee for nursing home administrators from \$108 to \$297.

I would like to submit my personal objection to this outrageous increase. Nearly 200% is unacceptable. Although I understand that the reduced number of licensed administrators in the state and increased overhead costs related to processing have led to this proposal, this huge increase is poorly timed and will no doubt serve only to further reduce the number of licensed administrators available in the state. Those persons maintaining licenses but not actively practicing as administrators, e.g. Directors of Nursing, consultants, Chief Financial Officers, et. al. will potentially reconsider maintaining the license in favor of inactivation or dropping it altogether. This will only further reduce the revenue generated from licenses.

I urge the board to reconsider the amount of this increase

Sincerely,



Martha M. Wess, RN, MHA, NHA
Vice President of Clinical Services, Complete HealthCare Resources, Inc.

MAY 10 2005



**The Best Thing
Next
To Pittsburgh**

COMMISSIONERS:

PATRICIA L. KIRKPATRICK
RICHARD L. FINK
JAMES V. SCAHILL



HEALTH CENTER

ADMINISTRATOR
NANCY D. DRAGAN

14

May 13, 2005

Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, Pa 17101

Reference No. 16A6210 (#2469) (Biennial Renewal Fees)

Dear Sir or Madam:

I am writing to urge the Independent Regulatory Review Commission to reject the above referenced proposed regulation. I am the Nursing Home Administrator at the Armstrong County Health Center and have been a nursing home administrator since 1988.

I object to this proposed rulemaking, which seeks a 175% increase in the biennial renewal fees for licensed nursing home administrators. This is an excessive request. 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, in addition to the stress of operating a good nursing facility, will surely result in a number of those health-care professionals deciding not to renew their license, thus making the budget worse instead of better for the State Board.

The Department of Public Welfare (DPW) has proposed to cap any Medicaid increases in payment rates to nursing homes to a 2% increase over this year's rate on July 1, 2005. The irony of DPW proposing a 2% 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.

265 SOUTH MCKEAN STREET, KITTANNING, PENNSYLVANIA 16201

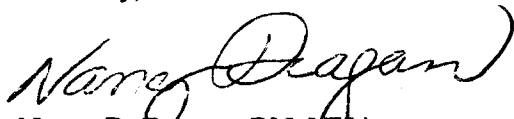
724-548-2222

FAX: 724-548-1103



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

Sincerely,

A handwritten signature in black ink, reading "Nancy Dragan". The signature is fluid and cursive, with the first name "Nancy" and last name "Dragan" clearly distinguishable.

Nancy D. Dragan, RN, NHA
Administrator, Armstrong County Health Center

Original: 2469

RECEIVED

2005 MAY 26 AM 8:42

INDEPENDENT REGULATORY REVIEW COMMISSION

May 11, 2005

Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, Pa. 17101

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

Dear Sir or Madam:

The Pennsylvania Association of County Affiliated Homes (PACAH) urges the Independent Regulatory Review Commission to reject the above referenced proposed regulation. PACAH represents all 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 rulemaking, 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 proposed to cap any Medicaid increases in payment rates to nursing homes to a 2% increase over this year's rate on July 1, 2005. The irony of DPW proposing a 2% 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.

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.



STEPHEN A. McSHANE, NHA
ADMINISTRATOR

GREEN ACRES

ADAMS COUNTY NURSING & REHABILITATION CENTER
595 BIGLERVILLE ROAD GETTYSBURG, PA 17325
TELEPHONE (717) 334-6249 Fax (717) 334-7847
E-mail smcshane@adamscounty.us



STEPHEN A. McSHANE, NHA
ADMINISTRATOR

Original: 2469

GREEN ACRES

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E-mail: smcshane@adamscounty.us

2005 JUN -3 PM 12:22

MAY 25 2005

May 11, 2005

Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, Pa. 17101

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

Dear Sir or Madam:

The Pennsylvania Association of County Affiliated Homes (PACAH) urges the Independent Regulatory Review Commission to reject the above referenced proposed regulation. PACAH represents all 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.

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Sincerely,

Michael J. Wilt
Executive Director.



Pennsylvania Health Care Association

315 North Second Street • Harrisburg, PA 17101
(717) 221-1800 • FAX (717) 221-8687 • www.phca.org

May 2, 2005

Ms. Christine Stuckey
Administrator, State Board of Examiners
of Nursing Home Administrators
PO Box 2649
Harrisburg, PA 17105-2649

RE: Proposed 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 275% increase in the renewal fees in one year, should be avoided. We could, however, 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,

Alan G. Rosenbloom
President and CEO

AGR/jlh

cc: Mr. John Jewett, IRRC

RECEIVED
MAY 17 AM 9:16
HARRISBURG, PA

MAY - 3 2005

Original: 2469

Christina Stuckey
State Board of Nursing Home Examiners
P.O.Box 2649
Harrisburg, PA 17105

2005 JUN -3 PM 12: 23

April 29, 2005

Dear Ms. Stuckey:

This letter is in response to the proposed regulations to amend the NHA license renewal fees from \$108 to \$297.

I have concerns regarding this proposed amendment as follows:

1. The increase is more than double the current fee which is a tremendous increase at one time. I would have to wonder why the board had not been better monitoring their own practices to anticipate such a need.
2. The proposed fee is higher than 4 contiguous states and lower than 2 others. Have the average NHA wages also been reviewed and compared in the 2 lower states? Have the number of nursing homes in those states been compared with PA?
3. The proposed fee of \$297 is a hardship for a large number of the NHA's in the state because they maintain their own license renewal without any reimbursement by the employer or are not directly employed to receive any reimbursement. In addition to maintaining the fee renewals the NHA's are also obligated to maintain current licensure status by obtaining the required number of credit hours. A large number of NHA's must pay for their continuing education costs. This obviously adds on to the burden.
4. If this proposed fee is passed, I fear that even more current NHA's will not renew due to the cost. The nursing facilities will suffer because there is a need for interim NHA's in several different situations across the state. There is also a small pool of retired NHA's that maintain their licensure status so that they can accept short term temporary NHA assignments. The fee and the education requirements would further deplete this pool.
5. There is a large number of NHA's that are also Registered Nurses who maintain their nursing licenses also. This cost is usually not reimbursed. This adds on to the NHA costs.

The current enforcement environment that the NHA's must work in is a daily struggle laden with high stress and long hours. It is difficult to find and keep good NHA's as many are leaving the field for other options. Raising the renewal rate at more than double the current rate is just not conducive to maintaining the NHA's that we do have. In my opinion, if you raise the rate as proposed, you will lose even more as there will be an increase in declining numbers of NHA's. Personally, I would not be able to maintain

MAY - 1 2005

my current licensure status if I did not have an employer to reimburse me for all the costs associated with maintaining it.

Sincerely,

Marcella E. Stoup, RN, NHA.

Marcella E. Stoup, RN, NHA

Original: 2469



Pennsylvania Health Care Association

315 North Second Street • Harrisburg, PA 17101
(717) 221-1800 • FAX (717) 221-8687 • www.phca.org

May 2, 2005

Ms. Christine Stuckey
Administrator, State Board of Examiners
of Nursing Home Administrators
PO Box 2649
Harrisburg, PA 17105-2649

2005 JUN -3 PM 12:23
RECEIVED
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OF NURSING HOME ADMINISTRATORS

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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,



Alan G. Rosenbloom
President and CEO

AGR/jlh

cc: Mr. John Jewett, IRRC

MAY - 3 2005