

"The future of long term care"

Pennsylvania Health Care Association

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Stuart H. Shapiro, M.D.
President and CEO

May 7, 2007

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

Reference no. 16A-627 (Administrator-in-Training Program)

Dear Ms. Stuckey:

The Pennsylvania Health Care Association, an organization representing nearly 300 long term care and senior service providers that care for more than 60,000 elderly and disabled individuals across the commonwealth, thank you for the opportunity to comment on the proposed Administrator-in-Training (AIT) regulations as proposed in the Pennsylvania Bulletin on April 7, 2007.

We believe it is important for the elderly and disabled persons requiring care in Pennsylvania's nursing homes that state government and boards, such as the Nursing Home Administrator's (NHA) Board, are under the realization of the fiscal challenges facing nursing facilities, especially in the light of lack of full funding of the Medical Assistance Case-Mix Reimbursement system for both the past and current state fiscal year. As the preamble to the proposed regulation states, the current fiscal constraints in many cases make it nearly impossible to afford the salaries of assistant administrators thus making it difficult for interested individuals to obtain the required experience to become nursing home administrators. This is precisely the wrong time, with the growing demographics of older Pennsylvanians who will require care and services in our nursing homes, to have regulatory road blocks in the way of fine individuals who have a desire to become nursing home administrators.

To that end, the Pennsylvania Health Care Association would like to congratulate the State Board of NHA's on these proposed regulations and ask that you seek to finalize the regulations as quickly as possible. We would also ask that if a significant number of candidates initially present themselves for admission into the AIT program that standard timings of meetings of the Board will not interfere in timely approval of training plans.

Again, PHCA is appreciative of the Board's understanding of the current void in licensed NHA's and we strongly support the AIT regulations as proposed. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Stuart Shapiro".

Stuart H. Shapiro, M.D.
 President and CEO

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