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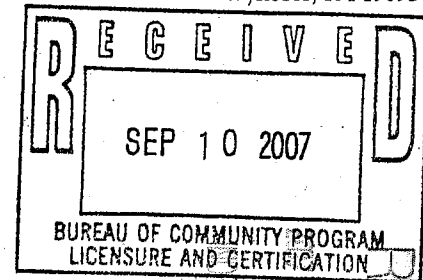
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OFFICE OF LEGAL COUNSEL

Wyncote House - Suite B1
25 Washington Lane
Wyncote, PA 19095

September 7, 2007

Janice Staloski, Director
Bureau of Community Program Licensure and Certification
132 Kline Plaza, Suite A
Harrisburg, PA 17104-1579



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DEPARTMENT OF HEALTH
BUREAU OF COMMUNITY PROGRAM LICENSURE AND CERTIFICATION

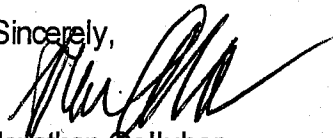
Dear Ms. Staloski,

We are a Home Health Care Registry preparing for compliance with the PA State Regulations. The following are some comments and questions we've encountered:

- 1) An out-of-state CNA Certificate is granted reciprocity in Long term Care Facilities; therefore, reciprocity should be granted for out-of-state CNA and Home Health Aide certification in Home Care.
- 2) Criminal Background Checks are done when Individuals are rostered and should be repeated in a set amount of time (every 2 – 3 years).
- 3) The required PPD according to Center for Disease Control is a 2-step test; however, the yearly PPD should be a single (1 step) test.
- 4) No one has addressed the procedures a Home Health Aide is prohibited from doing. Can they do eye drops, fleet enemas, suppositories, prescription creams, tube feedings and accuchecks (finger sticks).
- 5) We need to know where to send our Competency Test for approval.

Thank you. We appreciate any information or clarifications that you can provide.

Sincerely,


Jonathan Golluber
President