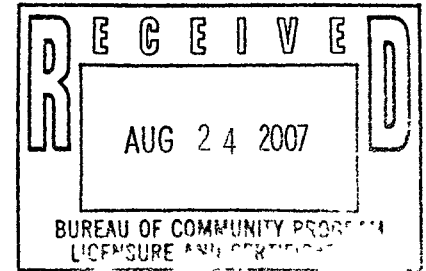


# Schuylkill Nursing Association, Inc.

2623

Janice Staloski  
Bureau of Community Program Licensure and Certification  
132 Kline Plaza, Suite A  
Harrisburg, Pa 17104



August 23, 2007

Dear Ms. Staloski:

I have read the proposed rulemaking for Home Care Agencies and Registries and would like to make the following remarks.

I am a small home care agency and am very concerned over the added costs to my agency. I totally agree that there must be standardized training and realize that this will be a mandatory added expense. My goal is to keep this cost at a minimum so that I do not have to pass this cost on to my clients or cap raises for my employees. All my clients are private pay – I do not participate in any state or federal programs.

My first question/comment is that it is stated in the proposal that there is a list of accepted training programs. I am hoping that this will be published for us to review in advance. I would like to also have the ability to create my own training program to contain costs which I understand as the proposal is written now must be approved by the department. Because of the high turnover in this field, I cannot afford to send all employees to a class. My other concern is that with such a high turnover, I do not want to pay for training an employee and having them jump to another agency and they are now "trained" for them. This agency jumping is a huge problem in Schuylkill County.

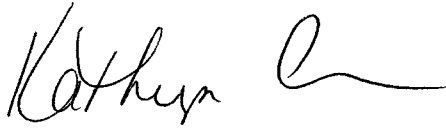
My biggest concern is the health screening, specifically the communicable diseases (not TB). I have checked into local health communities to see what they are doing. I have spoken with a director of nursing at a local hospital, a certified nurses aide in a nursing home and a LPN that works in a doctors office. None of these health care workers are screened yearly for communicable diseases. The LPN in the doctor's office does not even have a yearly Mantoux. This will be a huge expense for my agency especially since I only have an LPN on staff. It seems that home care agency's are being unfairly targeted in the health care industry to comply with such a strict regulation and unless it is to applied evenly to all health care industries, I do not think it should be included in this legislation. And, what type of screening is involved. Does it include laboratory studies? Can a questionnaire be used with perhaps a temperature to show that there isn't any infection present? If that is the case, then why not allow LPN's to perform the screenings.

P.O. Box 683, Schuylkill Haven, PA 17972

1-800-352-0899

Thank you for allowing this forum to express my concerns. Hopefully the Pa. Dept. of Health will be able to balance the needs of both clients and agency's with this legislation.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn Alven". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Kathryn Alven  
President

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