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INDEPENDENT REGULATORY  
REVIEW COMMISSION

#2712

August 17, 2008

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market St, 14th Floor  
Harrisburg, PA 17101

Re: Regulation ID #14-514 (#2712)

Dear Mr. Coccodrilli:

I am writing to you regarding the above referenced regulation. Section 2800.53 requires an Administrator of an Assisted Living Facility to have a minimum college education of 60 credit hours. There is no grandfather allowance for present Administrators without this education. Please consider my following comment.

There are successful Administrators in the Commonwealth that do their job with a high level of knowledge, skill and professionalism and do not meet this educational requirement. Some consideration should be given to the knowledge gained from years of experience. Presently, Administrators without a degree are functioning under the grandfather provision in the Personal Care Home Regulations of October, 2005. If the facilities they oversee will choose to follow Assisted Living requirements, they will be unable to continue in their positions.

I have seen many changes in our industry. Most have proven to enhance the lives of our residents, ensuring their safety and well-being. I respect the fact that Administrators make daily decisions that affect the lives of our residents and therefore they need to be well qualified for this position. I ask that you reconsider this proposal and allow current Administrators who have successfully met the expectations of the Department of Public Welfare to qualify to continue serving their residents. Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Pattiann Rohrbach".

Pattiann Rohrbach  
Campus Executive Director