

# 2712

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August 19, 2008

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Committee  
333 Market St., 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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

Dear Mr. Coccodrilli:

The purpose of this letter is to submit a public comment on the above-referenced regulation.

Specifically, I want to comment on **Section 2800.53** which requires an Administrator of an assisted living facility to have a college education consisting of at least 60 credit hours. My understanding of the proposed regulation is that it disregards age and years of experience, and no grandfathering provisions are being made.

Have you considered someone in their 50's or 60's who has been in the business for many years, worked their way up through the healthcare system without a college education, and has been an Administrator for over 10 years?

According to the proposed regulation, this person will be out of a job come July 9, 2009. Obviously, this is not fair and needs to be corrected. Someone who is 50 or 60 years old and doing great things in their career should not be regulated out of their position.

Obtaining 60 credit hours at an accredited college is unreachable by July 9, 2009. And, if someone this age starts attending college now on a part-time basis, they would probably not finish until their retirement date. Again, this is certainly not fair to the established Administrators in the Commonwealth who may be in this position.

There needs to be some sort of grandfathering provisions based on age and/or years of experience. Otherwise, the regulation as it is proposed appears to be discriminatory, particularly in reference to age discrimination.

Sincerely,

Lisa Schultz