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Arthur Coccorilli
Chairman

INDEPENDENT REGULATORY
REVIEW COMMISSION

Re: Regulation No. 14514

Please accept these written comments pertaining to the proposed regulations for Assisted Living Residences. These comments specifically address § 2800.53. *Qualifications and responsibilities of administrators.*

According to these proposed qualifications, an administrator must have one of the following:

1. A license as a registered nurse from the Department of State and 1 year, in the prior 10 years, of direct care or administrative experience in a health care or human services field.
2. An associate's degree or 60 credit hours from an accredited college or university in a human services field and 1 year, in the prior 10 years, of direct care or administrative experience in a health care or human services field.
3. An associate's degree or 60 credit hours from an accredited college or university in a field that is not related to human services and 2 years, in the prior 10 years, of direct care or administrative experience in a health care or human services field.
4. A license as a licensed practical nurse from the Department of State and 1 year, in the prior 10 years, of direct care or administrative experience in a health care or human services field.
5. A license as a nursing home administrator from the Department of State and 1 year, in the prior 10 years, of direct care or administrative experience in a health care or human services field.

I am concerned that that these proposed regulations are slighted toward newly hired and/or younger professionals. Additionally, I believe that these qualifications, as written, are discriminatory toward current Assisted Living Facility Administrators that do not meet them.

Assisted Living Facility Administrators currently already fulfilling the duties as required by the position should not be required to obtain additional college credits or licensing. As such, I ask that you reconsider these proposed regulations to include a clause for those already fulfilling administrator duties but that do not meet the proposed qualifications.

Respectfully,

Rebecca Dunlap