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Department of Public Welfare
6<sup>th</sup> Floor Bertolino Bldg.
Harrisburg, Pa. 17102

Reference Proposed Regulation 2800, IIRC #14-51

8/20/2008

Dear Gail,

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I have been a Personal Care Home Administrator for many years working in a range of environments from private owned for profit as well as not for profit CCRC's. There has been a lot of learning, growing and training while working closely with nursing staff, social workers and nursing home administrators to provide the best care possible for residents.

Garden Spot Village is a state of the art facility that is on the leading edge of person centered care. Individualized service, dignity, choice, satisfaction and total well being is what we are all about There is a supportive team in place that ensures that what ever the concern or need may be we are always looking for ways to meet that need for each individual.

My dilemma is I do not meet the administrator requirements under the proposed 2800 regulations. Here at Garden Spot Village there are two of us with our personal care home administrators license. The assistant administrator is also an LPN. We are both adept at the roles we perform and my talents and skills are strong in the administrative role of leadership, team building, oversight, regulatory compliance, verbal communication etc. I have been performing as the Director for several years here at Garden Spot Village. My career has been 19 years in the making and one I feel I am very efficient at and equally very proud of. However, I do not currently possess a college education or a degree in nursing.

The question I have is what will my options be moving forward? Will there be a grace period for those who do not meet this requirement. While I am certain enrolling in school could be a path to choose, even an associates degree would require time as I work fulltime in my current position. Is grandfathering a possibility for those currently employed as administrators?



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Also, could there be a specified time for administrators who do not have the required education to pursue and complete courses to meet the regulation. For instance, "any current administrator, who has been functioning as an AL Administrator for at least 5 years, must meet the department's educational requirements within 4 years of the effective date of the regulation." Additionally specific documentation must be provided to the department to ensure the Administrator is actively involved in a program that will meet the requirements of the regulation. The Department of Public Welfare would have to approve the educational program prior to granting this exception.

Licensing for Assisted Living under the new 2800 regulations is the logical direction for a facility such as Garden Spot Village to pursue. It would be wonderful to know that I have the opportunity to continue my career through this transition. Thank you for your time and attention.

Respectfully Submitted,

Denise J. Hoak

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