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creating the future of aging services for pennsylvania

**panpha**  
an association of nonprofit senior services

March 2, 2009

Sabrina Howell, Board Counsel  
State Board of Examiners of Nursing Home Administrators  
P.O. Box 2649  
Harrisburg, Pennsylvania 17105-2649

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2009 MAR 12 PM 4: 22  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

RE: Regulation ID #16A-6212 (#2747)

Dear Ms. Howell:

PANPHA, an association of more than 360 non-profit senior services providers, is submitting these comments on the Regulation #16A-6212 as published in the Saturday, February 21, 2009, edition of the Pennsylvania Bulletin. As an interested party and active participant, PANPHA applauds the Board's foresight to disseminate previous drafts and solicit input regarding the proposed rule change prior to submission to the Independent Regulatory Review Committee. We believe that this collaborative process leads to and has in this case lead to, the creation of meaningful changes that will serve to benefit the 1,912 licensed Nursing Home Administrators in Pennsylvania and the residents they serve.

PANPHA is happy to endorse the proposed rule change and strongly urges the IRRC to approve the request as expeditiously as possible. This proposed rule change represents the Commonwealth's finest attempt to ensure competitiveness and recognition of the "real world" challenges faced by the Long Term Care industry, specifically the leaders in our facilities.

Below are our comments specific to each proposed change:

§39.61(b) We recognize that the proposed change still ensures that continuing education credit is sufficient to maintain only the highest professional standards, and supports continued approval by the National Administrators Board of Examiners (NAB).

§39.61(c)(1) We strongly support the proposed change to be less restrictive as to the medium or channel used by licensees to obtain necessary continuing education credits. This change represents the Board's upstanding and consideration of the "real world" challenges of managing the day-to-day operations of a Long term care facility and provides the convenience of added venues from which to obtain the requisite continuing education. Specifically, this proposed language change will likely benefit the adult learners who have very different learning styles, allowing them to select the most appropriate medium.

§39.61(c)(2) PANPHA endorses the move to recognize NHA's who have chosen to lead by teaching continuing education classes and recommends the adoption of the language allowing for one quarter (12CEUS) to be obtained through this action.

§39.61(c)(3)(iv) Given the uncontrollable variables of the industry, the Board's perceptiveness in proposing to extend the time period for which Administrators author articles and receive credit is laudable. We support this change.

§39.61(c)(4) The increase of the number of maximum clock hours awarded retroactively for programs which have not been preapproved allows the Board sufficient time to ensure quality content of the programming. The increase in the time period from 30 days to 60 days is also endorsed.

§39.61(f) PANPHA supports the empowerment of the Board through the proposed change to this section. Allowance for the Board to grant extension of time for continuing education completion is necessary.

**Conclusion**

PANPHA welcomes the opportunity to wholly support and endorse the recommended changes proposed by the State Board of Examiners of Nursing Home Administrators and commends them on their thoughtful and deliberate leadership as evidenced by the positive and necessary changes submitted for review.

We urge the Independent Regulatory Review Commission to act swiftly in providing their approval for the recommended changes.

Respectfully submitted,



Regulatory Affairs Manager  
PANPHA, An Association of Non-Profit Senior Services