



Pennsylvania Health Care Association

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STUART H. SHAPIRO, M.D.
President and CEO

March 11, 2009

Mrs. Roberta Silver, Board Counsel
State Board of Examiners of Nursing Home Administrators
PO Box 2649
Harrisburg, PA 17105-2649

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INDEPENDENT REGULATORY
REVIEW COMMISSION

RE: Regulation #16A-6212

Dear Ms Silver:

On behalf of the Pennsylvania Health Care Association (PHCA), an organization that advocates for compassionate, quality long-term care for Pennsylvania's elderly and disabled residents, please accept our comments on the proposed regulation for the State Board of Examiners of Nursing Home Administrators as published in the February 21, 2009 Pennsylvania Bulletin.

We are pleased that the regulation, as proposed seeks to clarify, update and expand on the continuing education requirements for nursing home administrators. PHCA fully supports the proposed provision that would remove the restrictions on the modalities that nursing home administrators may use to receive approved educational credits. Additionally, PHCA is pleased with the Board's proposal to increase the amount of time, from 30 days to 60 days that a licensee would have to gain approval for authoring an article on long-term care. Finally, PHCA agrees with the amendment to allow the Board flexibility to grant an extension of time for a licensee to complete their continuing education hours if they apply for but are not granted an "illness, emergency or hardship" waiver. This proposal will permit the Board to evaluate each individual's circumstance when determining whether an extension is appropriate.

We appreciate the opportunity to provide our comments and support for this much needed update of continuing education regulations for nursing home administrators. PHCA and its members strongly encourage the Independent Regulatory Review Commission to approve this proposed regulation.

Sincerely,

Stuart H. Shapiro, M.D.
President and CEO

- cc: Senator Robert Tomlinson, Majority Chair, Senate Consumer Protection and Professional Licensure Committee
- Senator Lisa Boscola, Minority Chair, Senate Consumer Protection and Professional Licensure Committee
- Representative Michael McGeehan, Majority Chair, House Professional Licensure Committee
- Representative William Adolph, Minority Chair, House Professional Licensure Committee
- ✓ Mr. Scott Schalles, IRRC