

Pennsylvania Health Care Association

315 North Second Street • Harrisburg, PA 17101
(717) 221-1800 • FAX (717) 221-8687 • www.phca.org

Ann Steffanic
Board Administrator
State Board of Nursing
P.O. Box 2649
Harrisburg, PA 17105-2649

RE: 16A-5136 Biennial Renewal Fees

January 19, 2010

Dear Ms. Steffanic:

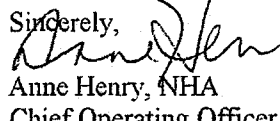
On behalf of the Pennsylvania Health Care Association (PHCA) and the Center for Assisted Living Management (CALM) which collectively represent approximately 325 long term care and senior service providers throughout Pennsylvania, please accept the following comments to the State Board of Nursing Biennial Renewal Fees proposed rulemaking (16A-5136) that was published in the December 19, 2009 Pennsylvania bulletin.

It is no secret that for many years there has been a shortage of nurses in Pennsylvania's workforce. This shortage is only expected to worsen in the next decade as baby boomers age and the need for health care grows. Based on this fact alone, it would seem that the commonwealth and in particular the State Board of Nursing should seek to remove impediments for individuals seeking to become and to work as nurses not place more in the way. It is our belief that an increase in licensure fees by the 45% proposed could create such an impediment.

Additionally, many nurses currently working in long-term care, in particular in nursing homes, are fortunate to have their license fees reimbursed by their employer. Nursing homes are under reimbursed by Pennsylvania's Medical Assistance program by nearly \$14 per day of care. Currently, nearly two-thirds of all residents in nursing homes have their care paid for by the Medical Assistance program. With reimbursement dollars flowing to nursing homes in short supply, homes have and will continue to look for ways to trim costs that will not affect their ability to maintain and enhance quality patient care. It would be unfortunate if the reimbursement of nurses' licensure fees would find their way to the chopping block but that may happen if the proposed 45% increase becomes reality.

At this time in particular, when the economy in Pennsylvania is challenging at best and as we continue to face a growing nursing shortage, PHCA/CALM respectfully requests that the that the State Board of Nursing reconsider the proposed rule to increase licensure fees of nurses and dietitian-nutritionists by 45%. Especially in this environment, it seems unfortunate that state government would look to force healthcare workers (and providers) to pay for the cost to operate the State Board. If the State Board were to request an increase that is more in line with the 1% increase to nursing homes for Medical Assistance that was contained in the state's fiscal budget for 2009-2010, PHCA/CALM would be more inclined to be supportive of the request.

Thank you for the opportunity to provide comment on the proposed rulemaking. If you need clarification or would like to discuss any of our concerns please do not hesitate to contact me.

Sincerely,

Anne Henry, NHA
Chief Operating Officer

RECEIVED
JAN 25 AM 9:15
INDEPENDENT REGULATION
AND COMMISSION