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LeadingAge PA

an association of not-for-profit senior services



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December 10, 2018

Cynthia K. Montgomery
Counsel to the Commissioner
P.O. Box 69523
Harrisburg, PA 17106-9523

Dear Ms. Montgomery:

LeadingAge PA, a trade association representing more than 320 not-for-profit providers of senior housing, health care and community services across the commonwealth, appreciates the opportunity to provide comments on the Bureau of Professional and Occupational Affairs' (BPOA) proposed regulation regarding the expungement of certain disciplinary records, published November 10, 2018 in the *Pennsylvania Bulletin*.

In line with LeadingAge PA's vision of senior services in Pennsylvania, our members strive to create a competent talented workforce that strives to provide excellent quality care. However, errors do sometimes occur. When they do, the individual must seek to correct them and learn from them. It is in this spirit that LeadingAge PA generally supports the proposed regulation.

The criteria described in the proposed regulation would help to protect employers and the public by applying only to a licensee's failure to complete all of the required continuing education or for practicing for less than six months on a lapsed license licensees. Further, the opportunity would only be available to licensees with no other disciplinary actions on their license. To provide additional protection to the public, an applicant could only use this expungement opportunity once and the BPOA would vet each applicant to assure that he or she is eligible.

This proposed regulation would provide a second chance to a licensee who has otherwise complied with all of the licensure requirements, but has made a one-time error with their licensure renewal or continuing education credits. Further, given the limited number of available qualified professionals, especially in many health care and human service programs, this regulatory change may offer employers additional committed and qualified candidates in their profession.

Again, thank you for the opportunity to comment. If you have any questions about our comments, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Beth Greenberg".

Beth Greenberg
Sr. Director of Regulatory Affairs
bgreenberg@leadingagepa.org