



an association of not-for-profit senior services

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February 28, 2020

Jaime D. Black, Counsel
State Board of Examiners of Nursing Home Administrators
P.O. Box 69523
Harrisburg, PA 17106-9523

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Dear Ms. Black:

Thank you for the opportunity to offer comments on the proposed regulation 16A-6219 (Continuing Education). LeadingAge PA is a trade association representing more than 350 not-for-profit providers of senior housing, health care and community services across the commonwealth. These providers serve more than 75,000 older Pennsylvanians and employ over 50,000 dedicated caregivers. Our members provide an array of services including nursing homes, which will be affected by the proposed changes to continuing education requirements for Nursing Home Administrators (NHAs).

LeadingAge PA members are committed to the provision of excellent senior services, while continually evolving to meet and even anticipate consumer demand, creating new ways of delivering needed services and improving upon traditional service lines. Key to our members' success is the culture of talent management and development as they seek to engage and empower team members, resulting in high performance, innovation and increased satisfaction, which brings us to the discussion of healthcare workforce issues in general and the provisions of the NHA Board's proposed regulation specifically.

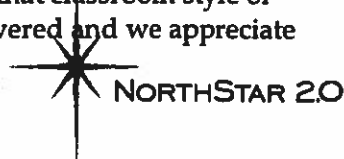
We recognize the significant leadership and the tremendous responsibility NHAs accept to provide the necessary care and services for each resident to attain or maintain the highest practicable physical, mental, and psychosocial well-being, in accordance with the comprehensive assessment and plan of care. While this is the most important duty, NHAs are also responsible for the wellbeing of their employees, the financial soundness of the facility, and compliance with the many state and federal requirements in addition to keeping up with the fast pace of change in this profession. Further, the NHA must develop key partnerships to sustain and improve their community, facility, and residents.

Definitions 39.1 and Continuing Education 39.61(h) - LeadingAge PA appreciates the additional flexibility provided by the Board in the change to the definition of clock hour to include units of education consisting of programs 30 minutes or longer to be credited in 15 minute increments.

Biennial Renewal 39.11 and Requirements 39.61 -

LeadingAge PA supports the NHA Board's update to the methods of contacting licensees to include notice via e-mail. We would prefer that the Board use both the e-mail address and licensee's address of record to notify of the availability of the renewal process.

Especially given the significant and expanding responsibilities of the NHA, we recognize the tremendous value of education to the attainment of successful practices. We are not convinced that classroom style or online learning opportunities are the only methods by which education can be delivered and we appreciate



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that the NHA regulations continue to recognize the educational value of mentoring, teaching and writing articles. LeadingAge PA members discussed the proposal to reduce the required number of continuing education (CE) hours per biennium and could not arrive at consensus. Members spoke to the tremendous value of education, while noting that some educational topics are needed but are not eligible for CE credit and that many educational activities such as reading articles to keep up on new trends and requirements do not earn CEs. While members appreciate the potential reduction in the burden of attending CE programs and the financial and personnel resources needed to support this activity, many worried that without the requirement, many employers would not invest in education even though it is still necessary.

Members also noted that they would prefer if a larger proportion of the CEs could be attained through serving as an instructor, authoring an article, or serving as a supervisor in a Board-approved Administrator in Training (AIT) program. We appreciate that the proposed rule continues to recognize these activities, but we urge the Board to leave in place the 12 clock hours that can be applied to CEs for conducting these important and educational activities, rather than reducing them to 9 clock hours as proposed in 39.61(c)(2) and 39.61(c)(3)(i) and (ii). We would also suggest that the number of CEs available for published articles described in 39.61(c)(3)(iii) remain at 24 clock hours and that clock hours for supervising an AIT as described in 39.61(c)(4) remain at 24 clock hours rather than being reduced to 18 clock hours.

It appears that the Board is contemplating moving to a fully online license renewal system, which would appear to streamline the licensing process and once accomplished is likely to be beneficial for most NHAs and their employers. Because of the rural nature of the Commonwealth and the lack of internet coverage in some areas of the state, the Board should consider providing an alternative renewal process for NHAs residing or working in these areas.

Continued Competence, 39.11b(3-5) – Due to the potentially lengthy time between Board meetings and the lack of qualified NHAs, we would suggest that the Board provide, for candidates whose license has expired, a way to work temporarily prior to appearing personally before the board.

Provider Responsibilities, 39.44 – The current certificate that participants in LeadingAge PA's CE programs receive from the National Association of State Boards of Nursing Home Administrators (NAB) includes all of the proposed fields except for the course provider number. We have consulted NAB about proposed changes to the education certificate and do not believe that they will conform to any additional state guidelines. Hence, we suggest that the NHA board remove the requirement for the course provider number to be included on the certificate. We have enclosed a sample CE certificate issued via NAB's CE registry for your information, and can be accessed via the [NAB-NCERS Sponsor User Guide](#).

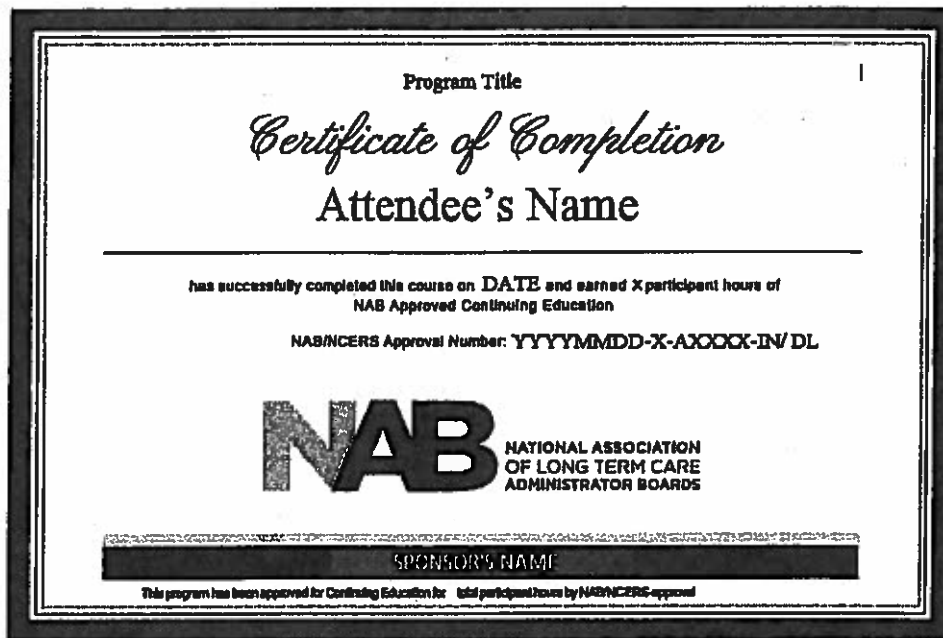
Thank you again for the opportunity to provide comments on the proposed changes to Pennsylvania's NHA continuing education requirements. We look forward to continuing to work with the Board as this regulation continues through the regulatory process. If you have any questions about our comments, please contact me.

Sincerely,



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

B. SAMPLE CE CERTIFICATE ISSUED VIA NAB'S CE REGISTRY



C. MODEL EVALUATION



Program title:

NCERS approval #:

Sponsoring Organization:

Program date(s):

- Scale:
- 5=Excellent
 - 4=Good
 - 3=Average
 - 2=Needs Improvement
 - 1=Unsatisfactory

Rate the following aspects of the program:

_____ Learning objectives we met