



August 6th 2018

Paula Pullano,
Rhode Island Department of Health
3 Capitol Hill
Providence, RI 02908

Dear Ms. Pullano,

On behalf of our non-profit nursing home providers, we wish to submit a brief comment on the proposed amendment to the proposed rules and regulations for Assisted Living Residence Administrators (RICR Title 216, Chapter 40, Subchapter 05, Part 18).

Specifically, we wish to clarify a provision in Section 18.3.6 Mandatory Continuing Education Requirements. The regulations include "The RI Association of Facilities and Services for the Aging" as an organization approved for providing continuing education credits. While that remains our legal name, we did file a Domestic Non-Profit Corporation Fictitious Business Name Statement form with the RI Office of the Secretary of State in January 2011 to use the name LeadingAge RI. In other words, we are the Rhode Island Association of Facilities and Services for the Aging 'doing business as' LeadingAge RI. At some point in the future, we may legally change our name. But for the time being, we suggest adding additional language to the regulations reflecting our commonly known name of LeadingAge RI to reduce confusion among Administrators. This could be done by simply adding "The RI Association of Facilities and Services for the Aging / LeadingAge RI" to the list of approved organizations, or "The RI Association of Facilities and Services for the Aging, also known as LeadingAge RI." We defer to the Department's discretion in how this can be most appropriately addressed.

Thank you for your consideration of these comments and we are happy to discuss further if necessary.

Sincerely,

A handwritten signature in black ink, appearing to read "James P. Nyberg", written in a cursive style.

James P. Nyberg

Director