



November 11, 2024

Jessica O'Brien
Iowa Department of Inspections, Appeals & Licensing
6200 Park Ave
Des Moines, Iowa 50321
Jessica.o'brien@dia.iowa.gov

Re: Comments on Administrative Rule Changes for Nursing Home Administrators

Dear Jessica,

LeadingAge Iowa is a trade association representing non-profit long-term care supports and services throughout the state of Iowa. We pride ourselves on advocating for our members who provide excellent quality of care throughout the long-term care continuum of services. Within our membership are several nursing homes who employ licensed nursing home administrators.

We fully support both administrative rule changes implementing action taken during the 2024 Legislative session relating to extending the duration of a provisional license and the ability to carry over up to 50% of the required continuing education hours. A clarification that may be helpful in the rules is outlining the effective date of this process. For example, would licensed administrators be able to carry over previously unused continuing education hours from the renewal period ending December 31, 2023, or will it be effective for future renewal periods, such as continuing education hours not used for renewal ending December 31, 2025? Clarification of the effective time frame would be useful for the successful implementation of the rule changes.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Kellie Van Ree".

Kellie Van Ree
Director of Clinical Services
LeadingAge Iowa
11001 Aurora Ave
Urbandale, IA 50322
kvanree@leadingageiowa.org