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January 16, 2026

Katherine Ceraolo
New York State Department of Health
Bureau of Program Counsel, Regulatory Affairs Unit
Empire State Plaza, Corning Tower, Room 2438
Albany, New York 12237

Re: HLT-51-25-00002-P – Licensure and Practice of Nursing Home Administration

Dear Ms. Ceraolo:

On behalf of the Healthcare Association of New York State's member nonprofit and public hospitals, nursing homes, home care agencies and other healthcare organizations, I write to comment on the above-referenced proposed regulation related to licensure and practice of nursing home administration.

Overall, HANYs supports the proposal to modify the nursing home administrator licensure and practice program.

In recent years, nursing homes have struggled to recruit and retain nursing home administrators. Restrictive field experience requirements and lengthy training hours have long been a deterrent to attracting new administrators to the long-term care field.

HANYs appreciates the relief that the expansion of field experience requirements will offer and agrees with DOH that it will encourage those interested in long-term care to explore a career in the field.

Additionally, the reduction in administrator training hours will relieve the burden on facility administrators and will more efficiently move administrators in training into administrator of record roles.

However, we have concerns about the proposal to reduce the required administrator preceptor years of experience from three years to one.

The role of the administrator is complex and integral to ensuring high-quality, resident-centered care. The administrator manages all aspects of daily nursing home operations, including but not limited to resident health and safety, facility finances, and statutory and regulatory compliance.

In healthcare and non-healthcare related fields it can take up to one year to become efficient, confident and competent in a new role. Administrator preceptors with only one year of experience may still be learning their role as an administrator and may not yet have sufficient experience to take on the preceptor responsibility.

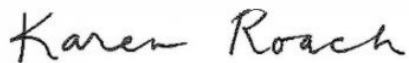
HANYS recommends that DOH consider these two alternative options:

1. Require preceptor administrators with one year of experience to have an arrangement with a licensed administrator with at least three years of experience. The purpose of this arrangement would be for the preceptor administrator to have access to a seasoned professional in the event that guidance is needed. Preceptor administrators who have at least five years of experience in a long-term care related field prior to becoming an administrator could be exempt from this requirement.
2. Reduce the years of experience for a preceptor administrator from three to two years.

These options would allow for the desired reduction, but would also ensure that the preceptor has sufficient experience and/or guidance in their role as a nursing home administrator.

HANYS appreciates the opportunity to provide these comments and looks forward to working with DOH on this issue. If you have any questions, contact me at 518.431.7711 or kroach@hanys.org.

Sincerely,

A handwritten signature in black ink that reads "Karen Roach". The script is cursive and fluid.

Karen Roach
Vice President, Regulatory Affairs and Rural Health