

## Dellinger, Cynthia H

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**From:** Pat Kelly <PKelly@wvhca.org>  
**Sent:** Wednesday, October 11, 2017 10:39 AM  
**To:** Dellinger, Cynthia H  
**Subject:** Public Comment - NH Rule

Dear Ms. Dellinger:

On October 9, 2017, the WVDHHR requested public comment on the Nursing Home Licensure Rule pursuant to WV Code 29A-3-20. This rule applies to all nursing homes licensed in the state of West Virginia. All the nursing homes in West Virginia, except the Veterans facility in Clarksburg, participate in the Medicare and/or Medicaid programs. A majority of the requirements in the state rule are identical to the federal requirements and in some case are more stringent. Members of our Association believe that the regulatory duplication is unnecessary. Currently, a nursing home can be cited for the same infraction under both state and federal law.

We stand ready to work with the department in addressing this issue.