

October 31, 2012

Deborah Gottschalk, Chief Policy Advisor
Office of the Secretary
Main Admin Building
1901 North DuPont Highway
P. O. Box 906
New Castle, DE 19720-0906

**RE: DLTCRP Proposed Nurse Assistant/CNA Training Regulation [16 DE Reg. 371
(October 1, 2012)]**

Dear Ms. Gottschalk:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Long Term Care Residents Protection (DLTCRP) proposal to adopt some discrete amendments to its regulation covering training and qualifications of nursing assistants and certified nursing assistants (CNAs). Council would like to share the following observations related to style and grammar.

First, in §1.0, definition of "CE Hour", consider the following revision: "CE Hour" means continuing education...instruction.". This would be consistent with the form used in the preceding definition of "CE Track". It would also conform to the Register of Regulations Delaware Administrative Code Drafting & Style Manual published at <http://regulations.delaware.gov/documents/drafting&stylemanual.pdf>. Section 3.1.2 of the Manual offers the following guidance on definitions: "Immediately after the defined word or term, insert the word "means". Parenthetically, the Division may wish to consider editing all of the definitions in §1.0 for consistency. Some refer to "shall mean". Some refer to "means". Some refer to "are defined". Some lack a verb altogether.

Second, in §2.4, there is a plural pronoun ("their") with a singular antecedent (CNA). The Division could either substitute "CNAs" for "A CNA" or delete the word "their".

Third, in §2.4.1, the introduction should be amended as follows: "The CNA dementia specific training shall include:...". Compare references to "the CNA Training Curriculum Committee" (§2.1); and "CNA training program" (§3.1.6).

Fourth, in §3.2.11, substitute "pillows" for "pillow".

Thank you for your time and consideration of our comments and concerns. Please feel free to contact me or Wendy Strauss should you have any questions.

Sincerely,

Terri A. Hancharick
Chairperson

TAH:kpc