

14-493-13
cc: PAI
FRAN
ME
DR. NO. ALICE
REGW



August 29, 2005

Department of Public Welfare
Office of Medical Assistance Programs
ATTN: Regulatory Coordinator
Room 515
Health and Welfare Building
Harrisburg, PA 17105

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BUF OF LTC PGMS
REFER TO GAIL

DEPUTY SECRETARY
OF M.A. PROGRAM
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CARE SERVICES

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Re: Comments of Proposed Rulemaking

Beverly Enterprises Inc. strongly opposes the proposed changes to clinical preadmission requirements.

PROGRAM ANALYSIS
AND REVIEW SECTION

Serious Concerns With Proposed Preadmission Requirements

Presently, individuals seeking admission to our nursing facilities may be admitted pending completion of the OPTIONS evaluation by the Area Agency on Aging. While every effort is made to complete the OPTIONS assessment before admission, admission is not delayed or deferred pending completion when the patient seeks nursing facility placement and when nursing facility placement is urgent.

There are many times when the patient needs to be transferred from the hospital to the nursing home in the most expeditious manor possible. This regulation will dramatically slow the process and will ultimately be detrimental to the patient, and more costly to the Commonwealth as the hospital length of stay increases. Additionally, we do not think it is appropriate, nor perhaps legal, to question or investigate whether patients will become financially eligible for Medicaid at some future date.

Our primary concern is for the well being of the patient. A regulation that will unnecessarily increase hospital stays is poor treatment of those we serve and irrational in its logic. Please consider amending the proposed regulation so as not to burden our patients with an unnecessary, unwieldy, time consuming procedure that will adversely affect patient care.

Respectfully yours,

William J. Meenan
Regional Vice President

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2005 SEP 22 PM 2:14
REGULATORY
COMMISSION

Region 3 Office

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