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September 6, 2005

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REFER TO Brady

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

SEP 13 2005  
cc: PM  
FRAN  
JIM  
JULIA

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PROGRAM ANALYSIS  
AND REVIEW SECTION

Dear Regulations Coordinator:

Thank you for the opportunity to respond to the proposed changes to 55 Code Chapter 1187 regarding preadmission requirements for Nursing Facilities.

Philadelphia Corporation for Aging is unconditionally committed to ensuring each and every consumer has the opportunity to make an informed decision regarding home and community based care prior to entering a Nursing Facility. Accordingly, PCA wholeheartedly supports the requirement of a comprehensive assessment prior to admission for any consumer who will spend down to MA eligibility within their first 12 months of Nursing Home placement.

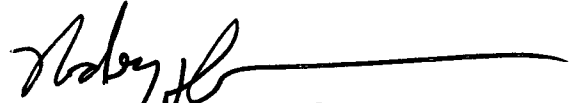
Current regulations require a preadmission assessment for consumers who will spend down to MA eligibility within their first 3 months of placement. This regulation has, unfortunately, not been enforced. Consumers are frequently placed in Nursing Facilities and PCA is contacted after admission or after death or discharge. Hospital discharge planners and Nursing Home admission staff need to be educated regarding the availability of home and community services, as well as the monetary penalties in the Pennsylvania Code. PCA will be happy to assist with and provide a venue for educational sessions for discharge and admission staff.

As previously mentioned, PCA strongly believes in giving people options regarding their long term care needs, primarily home and community based care. PCA currently has a waiting list for services of 308 Nursing Facility Clinically Eligible who are not MA eligible. With the closure of the Bridge Program, in order to truly be able to divert this population we need additional state funds through our block grant with PDA, primarily lottery dollars. We would appreciate your advocacy in helping us secure the resources we need to be able to keep individuals out of nursing homes.

Regulations Coordinator  
September 6, 2005  
Page 2

Thank you again for the opportunity to express our support of these proposed regulations. If you have any additional questions or would like to further discuss this opportunity to emphasize Pennsylvania's commitment to home and community based care, please do not hesitate to contact Becky Johnson, Long Term Care Access Director, at 215-765-9000, extension 2401, or by e-mail to [bjohnson@pcaphl.org](mailto:bjohnson@pcaphl.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Rodney D. Williams", followed by a long horizontal line extending to the right.

RODNEY D. WILLIAMS  
President

RDW/bj