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Pennsylvania Association of Area Agencies on Aging, Inc.

525 South 29th Street, Harrisburg, Pennsylvania 17104

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Phone: (717) 541-4214 • Fax: (717) 541-4217

SEP 19 2005

BUR OF LTC PGMS

September 7, 2005  
**PROGRAM ANALYSIS  
AND REVIEW SECTION**

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REFER TO: Bulley

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Department of Public Welfare  
Office of Medical Assistance Programs  
Room 5151 Health and Welfare Building  
Harrisburg, PA 17105

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CARE SERVICES

SEP 19 2005

Attn: Regulations Coordinator

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The Pennsylvania Association of Area Agencies on Aging (P4A) would like to acknowledge our full support of the proposed rulemaking entitled **Nursing Facility Services; Preadmission Requirements and Civil Rights Compliance for Nursing Facilities**. The changes outlined will provide information and service options to people that might otherwise not realize the availability of home and community-based support. In addition, capturing information regarding nursing home applicants as it relates to civil rights data can only serve to strengthen the Commonwealth's assurance of equal treatment of every seniors requesting nursing home support.

For more than thirty years, Pennsylvania's Aging Network has served as a focal point of services to our aging population. Fifty-two (52) Area Agencies on Aging serve the Commonwealth's sixty-seven (67) counties. County and non-profit Area Agencies on Aging (AAA's) are responsible for information, planning, developing, monitoring, providing cost-effective care, services, and advocacy to Pennsylvania's older population. AAA's are community designers and builders of support systems that enable older people to be active and vital in their community. AAA's also serve as gatekeepers, providing assessment and options, as alternatives to costly institutionalization. We strongly recommend assessments continue to be provided through the network of AAA's.

Touching lives every day, AAA's bring 2,897 employees with more than 20,000 years of cumulative experience together to serve as advocate and deliverer of in-home and community supportive care. Program emphasis has been increased to address the growing number of older frail and homebound individuals. However, AAA's have not lost sight of a desire to build continuums of care into the long-term care system. It is important to note that through AAA initiatives, nearly 76,000 volunteers provide over 2.4 million hours of community service. Statistical evidence demonstrates that approximately 490,000 individuals reach out each year to AAA's information and referral systems (I&R) for assistance and advice and more than 300,000 receive community based services.

The member agencies of P4A know that people that are given home and community-based service options earlier in the decision making process would choose to receive

services outside of nursing homes. While we acknowledge the need for nursing home services as part of a continuum of care, the long-term care system needs to be rebalanced to ensure that people can choose the least restrictive model of care available. As the population of seniors continues to increase, community-base care must be presented on a level playing field with the option of nursing home care. By introducing the pre-admission assessment earlier in the process, 12 months prior to financial eligibility, the number of people, both people over and under the age of 60, will have the information necessary to make an informed decision about their future.

The P4A also supports the proposed rule on record retention in order to ensure civil rights compliance by nursing homes.

We appreciate this opportunity to submit comments. Do not hesitate to contact us at 717-541-4214 with any questions regarding this submission.

Sincerely,



M. Crystal Lowe  
Executive Director  
Pennsylvania Association of Area Agencies on Aging

Cc: Nora Dowd Eisenhower, Secretary  
PA Department of Aging

Board Members  
Pennsylvania Association of Area Agencies on Aging

Brian Baxter  
Wojdak Consulting

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PA Department of Aging