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PROGRAM ANALYSIS  
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Dept. of Public Welfare  
Office of Medical Assistance Programs  
Attn: Regulations Coordinator  
Room 515 - Health and Welfare Building  
Harrisburg, PA 17105

RE: PA Bulletin Doc. No. 05-1435  
Nursing Facility Services; Preadmission  
Requirements for Nursing Facilities  
Chapter 1187

As part of the ownership and management of a 60 bed skilled nursing facility, we are concerned about the proposed change to expand requirements regarding admissions. As advocates for seniors, we feel this would be extremely detrimental.

We have questions:

1. In what time frame would this be accomplished? Are there any time constraints? Could it be done prior to discharge from a hospital? A delay could result in death while waiting for needed services. An ill person is in need of immediate assistance to meet their medical needs and is at risk. While waiting for an evaluation, who will take care of an elderly person that is sent home alone, who can't walk or care for themselves?
2. With a shortage of health care workers, where will reliable, trustworthy employees come from to provide home care services?
3. Would there be an adequate number of evaluations to meet the requests in a timely manner?
4. Is there adequate funding to provide these services? Would home services be covered and for how long?
5. If there is an eligibility requirement, how many of the total in need would be provided for?

There must be a better way to notify people of the opportunity for in-home care services without denying them immediate services and delaying care.

We hope serious consideration will be given to the flaws in this recommendation that applicants must be evaluated before admission to a skilled nursing facility. An applicant can always leave a skilled nursing facility if they choose to do so.

Sincerely,

Robert M. Peterson  
President of Operations

Sara Burdan  
VP of Marketing & Operations