



Lutheran Home Care Services, Inc.
Hospice of the Good Shepherd
Care Advantage

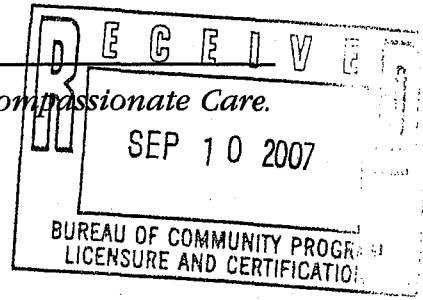
September 5, 2007

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Touching Lives with Compassionate Care.

Janice Staloski, Director
Pennsylvania Department of Health
Bureau of Community Program Licensure and Certification
132 Kline Plaza
Suite A
Harrisburg PA 17104-1579

OFFICE OF LEGAL COUNSEL



Dear Ms. Staloski:

Lutheran Home Care Services was established 30 years ago to meet the needs of individuals in their homes or other independent living environments within South Central Pennsylvania. The private duty program was established in 1997 and operates in Adams, Franklin and York Counties. We have over 100 caregivers and took care of 318 individuals with 150,000 hours of care in 2006.

We welcome the movement toward licensure and the current draft of the regulations follows our current policies and procedures almost 100%.

There are several questions/comments:

Section 611.53 Child Abuse Clearance. We are totally in favor of having all caregivers who come in contact with children to have a child abuse clearance. This not only protects innocent children in our care but also our agency. Given the tight margins in this industry, it seems a waste of time, money and energy to require those within the staff who do not come into contact with children to also have these clearances.

Section 611.55 Training Requirements. We firmly believe the better the caregivers are trained the better the care given, but we have found that the training for numbers 1-9 has been sufficient over the last 10 years of service, especially for those clients who do not require assistance with ADL's.

Section 611.56 Health Evaluations. We currently screen for TB both at date of hire and on an annual basis. The verbiage "and was screened for the following communicable diseases or conditions: 1-5" is confusing. Again, looking at the cost of "screening" over 100 current caregivers for these five conditions seems unduly burdensome. Neither our home health or hospice programs are required to "screen" for these conditions so it seems unreasonable to require that the least clinical program have to abide by the highest standards of clinical screening.

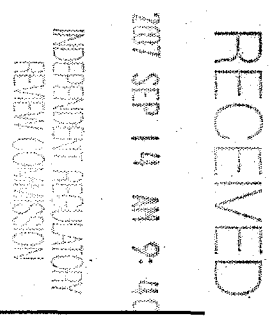
Section 611.32 Retention of Records. Our corporate office is in Franklin County where our human resources staff are located and all of our personnel records are kept. Having to maintain personnel records in each program office would require that we identify staff in each office to maintain those records in an appropriate fashion and secure space in each office for storage of those records. This would present an unnecessary hardship and a significant outlay of additional dollars for us. We would suggest that it be required that the records be available in the program office within a reasonable time frame as opposed to being located there.

Our goal is to continue to care for Pennsylvanians in need using every asset available to us. We are conscientious about waste and do not want to spend time and money on processes and programs where our clients do not enjoy the benefit.

Thank you for your time and attention to these matters.

Sincerely,

Pat Gentry
Director of In Home Support
Lutheran Home Care and Hospice



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