



LIVING ASSISTANCE SERVICES

2623

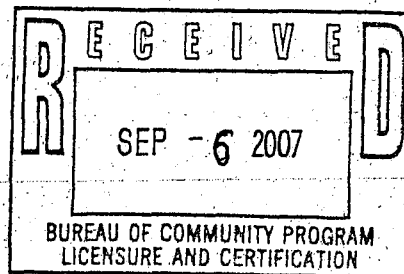
Phone: 717-393-3450
Fax: 717-509-8384

202 Butler Ave., Suite 302
Lancaster, PA 17601
Angelsat156@aol.com
www.VisitingAngels.com

RECEIVED
DEPARTMENT OF HEALTH
2007 SEP 10 AM 9:20
OFFICE OF LEGAL COUNSEL

September 5, 2007

Janice Staloski, Director
Pennsylvania Department of Health
Bureau of Community Program Licensure and Certification
1332 Kline Plaza
Suite A
Harrisburg, PA 17104-1579



Dear Ms. Staloski:

Six years ago, after being a nurse for 43 years, I started Visiting Angels of Lancaster County to provide essential and affordable non-medical services including:

- Respite care for family caregivers
- Transition support from hospital to home
- Companionship
- Personal bathing
- Shopping assistance
- Light housekeeping

We provide these quality non-medical services with a competent staff of caring employees which enables our clients to stay in their homes at reasonable rates. The rates for our services are based on our overhead costs including worker's compensation insurance for our employees. Already, too many elderly people delay care due to our current costs and wait until it is too late to get help.

Many of the proposed mandates in your proposed regulations are essential and truly needed. However, a few seem above and beyond; not even nursing homes and hospitals are required to meet all of currently proposed mandates for training for non-medical services.

I do support the need for licensure, but as you proceed with the extreme requirements in the proposed regulations, please consider that the increased costs will have to be passed along to the consumer. Those costs include:

- The extra screening for communicable diseases other than TB.
- The number of hours of required training to train employees for situations they will never encounter in a person's home.
- The additional space employers will have to obtain to provide training.
- The realistic testing of caregivers that will discourage many in the pool of caring people who are willing to provide non-medical services.
- Most of the homecare clients pay out-of-pocket for homecare services.

We provide greatly needed, essential non-medical services, and I stress the word "essential." I invite you to come and spend a day with us at Visiting Angels as we work to provide quality non-medical services to current and potential clients and their families.

Sincerely,