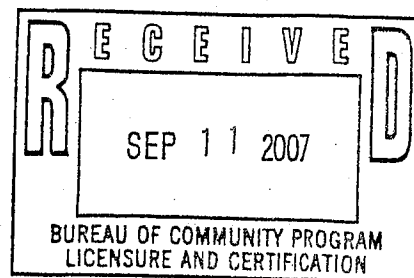


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INDEPENDENT REGULATORY
REVIEW COMMISSION



September 7, 2007

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

Dear Ms. Staloski,

I am writing today to share my comments/ concerns regarding the draft Homecare Agency Regulations as published in the Pa Bulletin August 11, 2007.

I bring to you my perspective on these issues as a *homecare agency owner*, as a *Registered Nurse*, and as a *former Home Health Care Administrator*. I have worked in this industry for 20 years and although I support the writing of the regulations for the protection of the consumers that we serve, I also believe we need to achieve a realistic balance of training and health screening requirements so that our business can continue to cost effectively meet the needs of the elderly whom we lovingly serve.

611.55 Training Requirements- Homecare agencies provide "non-medical" homecare services. Only subsections 1-9 should be required as any part of the competency exam or program. Subject areas 10-16 are applicable only to hands on care and are not appropriate or necessary for someone who only performs instrumental activities of daily living. Requiring the additional competencies will only add additional program costs and subsequently higher fees for the consumers we are trying to serve. The additional requirements may also be overwhelming for the "companion" candidate causing them to not pursue employment with a homecare agency and further inhibiting our ability to serve the seniors in need by not being able to hire enough team members.

611.56 Health Evaluations- Please remove items 1-5. These requirements far exceed the intent of the original bill and frankly, not even hospitals require this kind of scrutiny for their staff. Again, the additional costs that this adds to the business overhead only hurt the consumer.

611.31 Inspections- Our agencies operate with a skeleton staff and many times we are not in our offices to receive an unannounced surveyor. It would be most practical for both the agency and the surveyor to schedule the surveys in advance so that valuable time is not wasted by either party.

Thank you for considering these comments. I look forward to working with the Department as the licensure process continues.

Sincerely,



Susan J. Heinle, RN
President
Visiting Angels York and Hanover

Visiting Angels
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