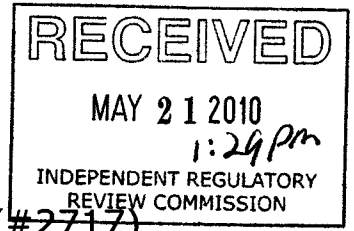


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05/21/2010

#14-514 (#2717)



Assisted Living Regulations
Written Comments from Liberty Resources, Inc.

Liberty Resources, Inc. is a Center for Independent Living that advocates with disabled people, individually and collectively, to ensure their civil rights and equal access to all aspects of life in the community.

LRI has had an opportunity to review the Commonwealth's proposed assisted living regulations and has the following concerns. The regulations in general are weak compared to the vision laid out by the many advocates who advised on the commonwealth the formulation of these regulations for well over a year.

Main Concerns:

- Room size especially for existing facilities is too small (with a completely new and troubling "exception" process with no parameters) for residents, especially residents using wheelchairs and other mobility devices.
- Residents are not offered the choice of any medical provider (including psychiatrists) other than one's primary care physician
- Watered down fire safety requirements, bed rail provisions that do not meet or exceed the PCH regulations
- A dangerously broad loophole that you can drive a Mack truck through in the Informed Consent provisions—
- Removing "imminent and substantial" as a qualifier for risk before an informed consent process

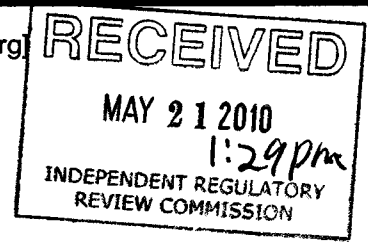
a) the provider has the discretion to force informed consent for even the most minor of "risks." We and our consumers think this provision is particularly troubling for people with mental illness.

Liberty sees these and other things in the regulations that seem to protect the providers of this service more than the consumer residents. We are an independent living center ran can controlled by consumers. This is submitted in the hope that the civil rights of people with disabilities and elderly will come first, even if it means delaying these regulations at this time. Thank you for the opportunity to comment.

On behalf of Liberty Resources,
Cassie James-Holdsworth
National Director of Policy & Advocacy- LRI

2712

From: Dominique Simmons [DominiqueSimmons@libertyresources.org]
Sent: Friday, May 21, 2010 1:26 PM
To: IRRC
Cc: Cassie Holdworth-James
Subject: Comments to #14-514 (#2712)
Attachments: Comments to IRRC.pdf



Hello,
I have also attached a copy of the comments on IRRC on behalf of Liberty Resources, made by Cassie James-Holdsworth. Please review.

Thank you,

Dominique M. Simmons
Liberty Resources, Inc.
National Policy & Advocacy Assistant

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(215)634-2000 x 362

DS *JHJ.*
JMS.