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From: Shawn Barndt [sbarndt@chestnutknoll.com]
Sent: Tuesday, August 12, 2008 3:03 PM
To: IRRC
Subject: comments on ALR 2800

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INDEPENDENT REGULATORY REVIEW COMMISSION
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What I see when I read the proposed regulations is increased cost.

I have been employed at Chestnut Knoll Assisted Living for almost 8 years now. Each October, as we budget for the next year, we take into consideration all costs and budget for those costs. Chestnut Knoll is privately owned by a group of partners. The Owners expect a certain profit level. Therefore, despite rising expenses, the profit margin remains the same. So, what that means, is that any additional costs that are added will in fact, without a doubt, be passed directly onto the residents via a rent increase.

When I look at the proposed ALR 2800 regs, I see a huge increase to the consumers. Then, I envision the residents who can barely afford the care now being discouraged by the new high level rates, thus not making the move to the care level they are in need of. I will now discuss the areas that will increase cost to the consumers:

New license fees: By my calculations, Chestnut Knoll now pays \$50.00 for our annual license. Under the new regs, we'd pay close to \$13, 000.00! So \$1,083.00 per month would be added onto our expenses, thus passed onto the consumer.

Kitchen Capacity: Chestnut Knoll currently has 4 units that have small kitchenettes. The refrigerators are used, but nothing else. It is an added cost that the vast majority of our population will not use. We encourage residents to be out of their room and social. Meal time in the dining room is a positive social experience. If residents have kitchens in their apartments, there is really no need for them to come out and socialize.

With all the concern regarding fire safety I am suprised to see that residents need access to a stovetop. That is a huge fire safety concern!

Registered nurse requirement: This is certainly just another unessessary added cost. As an administrator, I have conducted assessments on new residents and have done just fine. I don't believe I need an RN to then double check my work for me. Also, we have a system in place where a care assistant actually helps to put together the support plans - after all, they are the ones following them and providing the care - they know best of what the needs are. Why an RN? An RN salary in our area starts at minimul \$30 per hour plus employer taxes and benefits. Yet another cost that would be added to our expenses and passed onto the consumers.

Other areas of concern include the fact that transfer and discharges will need to be called to the ombudsman. In Berks county, we have volunteer ombudsman. We are the professionals who are caring for the resident and who are ultimately responsible for the resident and Liable for that resident. Therefore, there shouldn't be any delay if a transfer or discharge needs to occur. To delay the process by adding a local volunteer into the mix is totally uncalled for and not necessary. The office of ageing is already behind on tasks when called. Has anyone run this requirement by them?

Thank you for the opportunity to respond to the regulations. Although Chestnut Knoll would like to convert to the Assisted Living, the final decision will be based upon all of these unnecessary cost factors. I trust that the decision makers will keep in mind the cost factors and the fact that all increased costs WILL be passed DIRECTLY ONTO THE CONSUMER.

Shawn Barndt