

17-514 L-12

#2712

CHRIST'S HOME
Retirement Community

Gail Weidman
Office of Long-Term Care Living
Bureau of Policy and Strategic Planning
P.O. Box 2675
Harrisburg, PA 17105
August 22, 2008

INDEPENDENT REGULATORY
REVIEW COMMISSION

2008 AUG 28 PM 2: 56

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RE: Regulation No. 14-514

Dear Ms. Weidman;

I want to give you my comments regarding the proposed Assisted Living Regulations as a licensed professional and consumer. While I applaud your identified benefit to "allow individuals to age in place" I do have concerns that your additional benefit to "protect consumers health and safety, privacy and autonomy while at the same time balancing providers' concerns related to liability and individual choice" will not be accomplished.

3000 THE COMMONS
REFERRAL

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The fees for our facility would be \$6,275.00 (\$105.00 per bed x 55 = \$5,775.00 + \$500.00 = \$6,275.00). This alone would deter our organization from becoming licensed as we would have to pass this cost on directly to our residents. With an average census of 33 that equals \$190.00 per resident.

Regulation 64(a)(1)(2)(3); By identifying aging in place as a stated benefit, this acknowledges that the level of care will increase. Thus a Nursing Home Administrator who meets the qualifications in 54 should be grandfathered in from the requirements of Regulation 64 as the NHA currently oversee a level of care higher than that of Assisted Living.

Regulation 64(a)(3)(b)(3) requiring an Administrator to be CPR & First Aide certified would effectively remove individuals who physically could not perform CPR. Direct Care staff should meet the CPR & First Aide requirement. Programs where Administrators are not performing as Direct Care staff should be exempt for this requirement. Administrators are by your regulatory requirements are to direct the operations of the facility. It is discriminatory that you would purposefully exclude capable individuals from the role of administrators, specifically those licensed as Nursing Home Administrators whose role is to direct the operations of facilities with residents requiring a much higher level of care.

Garden Apartments
Assisted Living Community
Health Care

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American Association
of Homes and Services
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Pennsylvania Association
of Non Profit Homes for
the Aging

1220 West Street Road
Warminster, Pa 18974

Tel: 215.956.2270

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www.christshome.com



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Respectfully Submitted,



Kevin Williams NHA, CASP
Administrator of Senior Adult Program

cc: State Representative Kathy Watson
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Suite B
Warminster, PA 18974

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PANPHA
1100 Bent Creek Boulevard
Mechanicsburg, PA 17050



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