



TWIN CEDARS

INC.

ASSISTED LIVING CENTER

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Shohola, Pennsylvania 18458
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#2712

14-514

L-8



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2008 AUG 28 PM 2: 56

INDEPENDENT REGULATORY
REVIEW COMMISSION

8-22

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08 AUG 25 PM 9: 37

OFFICE OF THE
ATTORNEY GENERAL

Concerning 2800 Regulations

① We live WAY out in the County -
in relation to the home's vehicles MUST
be wheelchair accessible - we would choose
not to take people with this need because
we'd have to purchase a new vehicle to
the tune of about \$40,000

② As far as the Ombudsman as an ACTIVE
PARTICIPANT of each discharge plan - has
anyone spoken with AREA Agency on Aging
about this - Our County would have to
hedge another ombudsman full time
just to take care of these duties!

2800.11 Procedural requirements for licensure or approval of ALR

- (1) A \$500 license application or renewal fee
- (2) A \$105 per bed fee that may be adjusted by the Department annually at a rate not to exceed the consumer price index. The Department shall publish a notice in the PA Bulletin when the per bed fee is increased.

Question:

What do you currently pay for your PCH License? \$ 20
Under the ALR Regulations you would pay \$500 + \$105 x beds = \$ 4175

2800.101 Resident living unit

(2) Existing homes - require 175 sq. ft. (excluding bathroom and closet.)
Shared rooms require an additional 80 sq. ft.

Question:

Do your resident rooms meet the required square footage requirements?

- ~~NO~~ Private rooms with 175 sq. ft.
- ~~NO~~ Shared rooms with 255 sq. ft.
- YES Personal Care Home can not meet the square footage requirements

2800.101 (d) Kitchen Capacity

Existing Facilities Facilities that convert to residences after _____ (effective date) must meet the following requirements:

The residence shall provide a small refrigerator and microwave oven in each living unit. The residence shall provide access to a sink for dishes, a stovetop for hot food preparation and a food preparation area in a common area. The common resident kitchen shall not include the kitchen used by the residence staff for the preparation of resident or employee meals or the storage of goods.

Question:

Can your home meet the requirements for the kitchen capacity: X YES NO
If you answer yes, estimate the cost for refrigerator and microwave per room: \$ 7200

2800.56 Administrator Staffing

(a) The administrator shall be present in the residence an **average of 40 hours or more per week**, in each calendar month. At least 30 hours per month shall be during normal business hours (b) The administrator shall designate a staff person to supervise the residence in the administrator's absence. The designee shall have the same training required for an administrator.

Question:

If you elected to be an AL Residence and operate under the 2800 regs, can you afford for 2 individuals to be trained under the ALR regulations? YES X NO

**2800.25 Resident Residence Contract and
2800.220 Assisted Living Residence Services**

(a) Services. The residence must provide (a) core services as specified in subsection (b).

(b) **Core Services.** The residence must at a minimum, provide the following services:

- (1) Meals and snacks
- (2) Laundry services
- (3) Social and recreational activities
- ~~—~~(4) Assistance with performing ADL's and IADL's
- ~~—~~(5) Assistance with self-administration of medication or medication administration as indicated in the resident's assessment and support plan
- (6) Household services
- ~~—~~(7) Transportation

This fee schedule and bundling of Core Service is open for interpretation as written. The question remains as to whether the fee schedule for services and accompanying charges for the services to the resident will be permitted. It does not address if the residence has the option to bundle or unbundle specific core services.

Question: Do you currently bundle Core Services? YES NO

we bundle all but #4 #5 & #7

Thank you very much for your attention

Sincerely

Linda O'Harding, RNC

Dir Resident Health Services