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# Menno Haven Retirement Communities

2008 SEP - 8 PM 12:49  
INDEPENDENT REGULATORY  
BANK OF LTC PGMS  
REVIEW COMMISSION REFER TO \_\_\_\_\_  
2008 SEP - 3 AM 9:42

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August 29, 2008

**Menno Haven Retirement Communities**  
2011 Scotland Avenue  
Chambersburg, PA 17201  
FAX (717) 261-0860  
(717) 262-1000

Gail Weidman  
Office of Long Term Living  
Department of Public Welfare  
6<sup>th</sup> Floor, Bertolino Building  
Harrisburg, PA 17120

Dear Ms. Weidman:

**Menno Village**  
2075 Scotland Avenue  
Chambersburg, PA 17201  
FAX (717) 263-6988  
(717) 263-8545

I am the Director of Village Square Assisted Living at Menno Haven Retirement Communities, Inc. located in Chambersburg, PA. We have been licensed as a Personal Care facility for 20 years and are proud of the quality of life offered to our residents.

**Penn Hall**  
1425 Philadelphia Avenue  
Chambersburg, PA 17201  
FAX (717) 261-1764  
(717) 261-0220

I also am currently serving as the President of the Association of Personal Care Administrators. Our organization represents about 130 personal care providers from across Pennsylvania. Our members' facilities range from the small privately owned homes to the large Continuing Care Retirement Communities such as Menno Haven, Inc. Many of the homes will not be able to meet the expectations or the costs of the proposed regulations.

There are many costs associated with the proposed Assisted Living regulations that will not add to the direct care given to the residents but will have an impact on the residents' cost to live in an assisted living facility.

**Northfield at Menno Haven**  
2227 Scotland Avenue  
Chambersburg, PA 17201  
FAX (717) 262-9069  
(717) 262-2373

Here are some examples of costs associated with being compliant with the proposed regulations:

1. 2800.11 c—the annual license renewal fee would be in excess of \$13,000.00 for our facility.
2. 2800.56—the administrator's designee shall have the same training required for an administrator. Compliance to this regulation would require at least 6 other staff members to be qualified in addition to the administrator to have 24/7 coverage.
3. 2800.60—the residence shall have a nurse on call at all times. It is not specified if this is an RN or LPN. The residence shall have a dietician on staff or under contract.
4. 2800.83—existing residences must submit justification to DPW for the use of window air-conditioning units or provide central air-conditioning.

**ElderDay Adult Day Center**  
1427 Philadelphia Avenue  
Chambersburg, PA 17201  
FAX (717) 709-4509  
(717) 709-4510

5. 2800.96—each first aid kit shall include an automatic electronic defibrillation device. The average cost of an AED is \$ 2200.00. In addition to the first aid kit in our facility, we have 8 transportation vehicles that are all equipped with a first aid kit.
6. 2800.101 d—existing facilities shall provide a small refrigerator and a microwave oven in each unit and access to a sink, a stovetop and a food preparation area in a common area.
7. 2800.131—each unit must have a fire extinguisher. This is certainly a justifiable requirement for the safety of the residents, but a multi-purpose fire extinguisher can cost \$150.00.
8. 2800.227—an LPN, under the supervision of an RN, shall review and approve the support plan. This would require all facilities to have professional nurses on staff or under contract to perform this quarterly review.

Thank you for allowing us the opportunity to express our concerns.

Sincerely,



Deborah Yowler  
Director of Village Square Assisted Living  
President of APCA

cc: PANPHA office  
Rep. Rob Kauffman