

9/2/2008

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Mr. Arthur Coccodrilli
Independent Regulatory Review Committee
333 Market Street, 14th floor
Harrisburg, PA 17101

INDEPENDENT REGULATORY
REVIEW COMMISSION

Re: Proposed 2800 Assisted Living Regulations

Dear Mr. Coccodrilli,

I would like to respectfully submit my comments in regard to the above mentioned regulations. We are a not-for-profit organization that strives to provide quality of life for all of our residents. Part of providing quality of life is our benevolent fund which helps to keep residents at Tel Hai long after their funds have depleted. I can not imagine what would happen to those residents if these funds were no longer available due to increased cost associated with the changes in regulations. You must know that most facilities will pass the added expense on to their residents. I deeply appreciate the efforts to make quality of care available for all seniors; however, there must be another way to do this without making the care unaffordable to those who need it most.

2800.11

A \$105 per bed fee is an extreme hardship for communities. This would cost our facility \$11,000 a year (including application fee). Monies that we all would agree would be better spent on the residents.

2800.30

It seems redundant to have the Ombudsman present for issues that the legal representative will be involved in.

2800.56

The administrator's presence in the home 40 hours or more per week does not allow time for continuing education, off campus evaluations, hospital visits, or vacation. It would also be a great expense and hardship for communities to train the designees as an administrator. Our nurses serve as designees when the Administrator is out of the office. They are qualified to handle any issues that arise.

2800.57A

Do these designees also require the same training as the Administrator?


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2800.61

Once or twice a year we use CNA agency staff to fill in for regular staff. It would be next to impossible to train them as specified in 2800.65. We do however use pool staff on and off that are trained in accordance with the regulations. Would it be possible to make exception for agency staff or staff used very short term.

2800.96

We do have an AED in our community; must it be specifically in our Assisted Living First aid kits? This is a great expense; will there be any special programs to assist with the purchase? We have multiple first aid kits. Is there one required for each first aid kit?

2800.101

While we do have a full kitchen available to our residents in our activities department as well as a community microwave, sink, and refrigerator on each floor, we do not have one in every room. Some residents would be a danger to them selves and others with a microwave. It only takes one mistake to start a fire.

2800.131

We have fire extinguishers throughout our facility that are routinely maintained. Placing fire extinguishers in every living unit is extreme. Residents could be injured by the fire extinguisher or worse. Staff is trained to take an extinguisher with them to the rooms when the fire alarm sounds. Residents are trained to alert staff in an emergency but may take it in their own hands to battle a fire if an extinguisher were in their room.

2800.141.a

May I suggest that medical evaluations continue to be accepted within 60 days prior to admission or within 30 days after admission?

2800.171

Regarding transportation, we must provide or coordinate but is this service billable?

2800.171d

Do all vehicles need to be handicapped accessible or just one?

2800.231

I am not exactly sure what you are considering a special care unit? Is this a dementia specific unit only?



Thanks for taking the time to respond to our many concerns. Your commitment to the senior population is greatly appreciated.

Sincerely,

Justine Hall
Justine Hall, RN, PCHA



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