



# Lutheran Social Services

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August 28, 2008

Gail Weidman  
Office of Long Term Living  
Department of Public Welfare  
6<sup>th</sup> Floor Bertolino Building  
Harrisburg, PA 17102

Dear Ms Weidman:

On behalf of those we serve, I offer the following comments relative to the proposed regulations for Assisted Living published Saturday, August 9, 2008. As CEO of a highly respected provider of services to our seniors in South Central Pennsylvania, I have serious concerns about the intent of the regulations and their impact on the residents of the State of Pennsylvania. These regulations, I believe, will limit the availability of care, increase the cost of care, and ultimately create a larger financial burden on the State of Pennsylvania.

The proposed regulations impose significant new costs for providers and, ultimately, those we care for. For organizations such as Lutheran Social Services, these regulations do not improve the quality of care; in fact, they may result in a decrease in resources available for care by forcing Lutheran Social Services to choose between physical plant changes and direct hands on care. The focus on physical plant design has little or no bearing on the care delivered to the residents. The increase in costs will result in higher fees to residents, therefore, depleting resident assets at an accelerated level and potentiality limiting their ability to access services. Furthermore, the regulations do not address the impact on the already insufficient public funding for low income Pennsylvanians who may need care but because of their economic situation are unable to access that care. For Lutheran Social Services, the increasing costs will require a greater cost per resident in benevolent dollars, thereby, limiting the number of low income residents that we are able to serve.

As a member of the PANPHA Board of Directors and a stakeholder in the well being of the residents we serve, I concur whole heartily with the objections as stated in the PANPHA response. I find inclusion of high license fees and high cost physical plant requirements to be poor stewardship of our citizens' resources. In addition, there are

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certain operational issues which will significantly increase costs for our residents. They include: the requirement that all vehicles must be handicap accessible, that an individual with credentialing equal to that of an administrator be present at all times, and that the requirement of an RN's involvement in the completion of the assessment tool. The proposed regulations do not raise the level or the quality of care we provide to our residents but will significantly increase cost.

As you are well aware, the State of Pennsylvania faces a critical situation relative to the resources it has available to care for the medical needs of our residents. Creating a system of rules that increases the costs to those with resources and asking them to more quickly impoverish themselves ultimately will result in a greater burden on the State's budget. I am sure that increasing the number of individuals requiring medical assistance payments for their medical care was not the intention of the legislators; nonetheless, these regulations clearly set a direction of public policy that moves us in that direction. I strongly urge the Department to take a serious look at the regulations they have proposed and rethink their intentions. I thank you in advance for your consideration of these suggestions.

Sincerely,



Robert L. Rundle  
President/CEO

cc: Pennsylvania State House of Representatives Eugene A. DePasquale, Dick L. Hess, Will Gabig, Keith J. Gillespie, Glen R. Grell, Rob W. Kauffman, Mark K. Keller, Beverly Mackereth, Ronald E. Miller, Daniel Moul, Jerry L. Nailor, Steven R. Nickol, Scott Perry, Todd Rock, Stanley E. Saylor

Pennsylvania State Senators Gibson E. Armstrong, John H. Eichelberger, Jeffrey E. Piccola, Terry L. Punt, Patricia H. Vance, Michael L. Waugh

Nick Luciano, Legislative Affairs Manager, PANPHA