



The Shook Home and the Quarters at the Shook

#2712

September 5, 2008

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

Dear Ms. Weidman,

As a Personal Care Service provider we at The Quarters at Shook value this opportunity to participate in the review process for regulation # 14514, Proposed Assisted Living Licensure and Regulations. Please find included a listing of concerns and comments on each.

Thank you.

Sincerely,

Debra Carbaugh
Personal Care Administrator
The Quarters at The Shook Home

14-514

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Continuing Care Retirement Community

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EQUAL HOUSING OPPORTUNITY

Assisted Living Licensure and Regulations as proposed present the following concerns:

- 1) Licensure fee is proposed at \$500.00 plus \$105.00 per bed assessment fee. If the Quarters chose to make 40 beds assisted living that would result in \$4700.00 in licensing fees.
- 2) There is no indication on what type of reimbursement will be available for assisted living.
- 3) Due to the proposed requirement for administrator hours in the facility being at 40 hrs/week and the designee required to have the same qualifications as administrator there will be a need for TWO administrators per facility in order to satisfy requirement 24/7.
- 4) AED's will be required in all first aid kits. These are required on living units and in all vehicles used to transport residents. Average cost is \$2300.00 per unit.
- 5) Transportation may be a requirement with escort service to appointments also being required. This would require a full-time driver position be added. All facility owned vehicles must be handicap accessible. Availability of one handicap accessible vehicle is sufficient to meet resident needs however, each provider should be permitted to decide if they wish to provide transportation at an additional charge.
- 6) Proposed regs require an RN to supervise and approve support plans completed by the LPN. Many personal care administrators have an LPN license and should not be required the expense of hiring an RN to supervise assessments and support plans the LPN is trained and qualified to do. Again this is an expense that will be passed on to consumers making assisted living unaffordable to many in the commonwealth.
- 7) Each living unit must have a sink with hot and cold running water to do dishes if the resident chooses to do food preparation in the room. Each unit must have a microwave oven. Residents shall have access to a cooking surface in a common area that is not used by staff for meal preparation. This will require major

renovations and thousands of dollars for an amenity many do not desire in assisted living as meals and snacks are included in the daily rate.

8) Proposed regs require facilities to provide copies of admission contract, house rules, facility handbook, detailed listing of any fee based services, complaint procedures, resident rights, contact information for DPW, licensing status of the most recent inspection and info to access the departments public website, and disclosure of any approved waivers the facility has. **This is required at the time of application. Facility handbook must be approved by DPW.** These requirements will simply cause applicants to feel overwhelmed as all of this information is reviewed and explained at the time of admission when there is an opportunity to ask questions.