



WESTMINSTER WOODS  
AT HUNTINGDON

A not-for-profit Retirement Community  
Presbyterian Homes in the Presbytery of Huntingdon

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

#2712

Gail Weidman  
Office of Long-Term Care Living  
Bureau of Policy and Strategic Planning  
P.O. Box 2675  
Harrisburg, PA 17105

September 8, 2008

Dear Gail Weidman:

As the administrator of Westminster Woods in Huntingdon, I have some serious concerns regarding the impact of the proposed Assisted Living Regulations on my facility and the residents we serve. While I support the concept of aging in place and allowing our residents to make choices regarding the services they receive, the proposed regulations would impose a financial burden on our facility.

Westminster Woods currently provides care and services to 34 residents a year, with 15-20% of them requiring us to subsidize a portion of their monthly fee because they do not have the income to pay the full rate. I am concerned that we will not be able to provide the level of subsidy we are able to provide today because of our increased costs. This would have the consequence of reducing seniors' access to care, rather than increasing it as the regulations intended.

The services we provide to our residents are very necessary and in demand, as evidenced by our percentage of occupancy which is consistently above 96%. While we do not provide skilled services, we do provide a wide range of services that allow our residents to age-in-place appropriately and delay admission to a nursing home. Our residents are very pleased with our facility, however, because of the requirements in the proposed regulations, we may not be able to serve those same residents tomorrow that we serve today. And, because of these changes we would have to make, the cost to the resident of this enhanced level of care will make it out of reach of most people with modest and low incomes.



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I have attached specific comments detailing other areas of concern to me, particularly those that have a dramatic cost impact, and ask that you please consider these comments in formulating a decision. The effect on seniors in my community and many others are going to be very negatively impacted if these regulations are approved without change.

Thank you for your attention to this matter.

Sincerely,

Nancy Luke  
Assisted Living Administrator

Cc: Independent Regulatory Review Commission  
c/o Arthur Coccodrilli, Chairman  
333 Market Street  
4<sup>th</sup> Floor  
Harrisburg, PA 17101

Senator John Eichelberger  
Senate Box 203030  
Harrisburg, PA 17120-3030

Representative Mike Fleck  
159A East Wing  
PO Box 202081  
Harrisburg, PA 17120-2081

**Reference: Proposed 2800 Regulations, IRRRC #14-514**

**2800.11** As a personal care residence with 34 residents, our current annual licensing fee is \$20. If the proposed fees were to become final it would cost \$4,070 per year.

**2800.56** First, there is the concern that the administrator must average 40 hours per week in the residence every calendar month. The administrator must be able to attend meetings, educational trainings as well as have sick, vacation, and holiday time. These regulations require a designee with the same qualifications to be present when the administrator is out. Placing a designee administrator to cover this time would cost \$26,529.

Secondly, the designee must have the same training as the administrator. The cost of the 100 hour course including travel and over night expense would be \$5,109.

Finally, the cost of having the designee attend 24 hours of annual training would be \$1000 for the training along with travel and expense.

**2800.69** As a personal care home that is staffed with 4 Licensed Practical Nurses (LPN) and 10 Personal Care Aides (PCA), the expense for the 2 hour annual specific dementia training and the 4 hour specific dementia training for 2 new hires is estimated at \$2192.

**2800.96** As a personal care home with 2 floors, each of which has its own first aid kit, adding an AED to each kit would be an expense of \$4600. Additionally, storing an AED in a kit would slow access to the AED. The AED should be at immediate access for all staff, not in the kit.

**2800.171** Placing an AED in each first aid kit in each vehicle that is used for transporting the residents would be an additional expense of \$4600.

All of the above expenses will increase the cost of operating a residence which would inevitably be passed on to all residents by increasing room and board rates. This impact in areas like ours that are not economically robust would significantly limit the providers' ability to offer Assisted Living services.