



Housing and Health Care Community

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INDEPENDENT REGULATORY
REVIEW COMMISSION

September 8, 2008

#2712

Kim Kaufman
Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: Department of Public Welfare - Assisted Living Regulations,
55 Pa. Code Chapter 2800

Dear Ms. Kaufman,

My name is Patty Curtin and I am a Social Worker at Brevillier Village which is a long term care provider in Erie, Pennsylvania. I work in Barnabas Court which is a Personal Care building that currently houses 57 residents. I have reviewed the proposed Assisted Living Regulations and am writing to you to express my concerns regarding some of the proposed regulations.

There are several reasons why I felt compelled to write to you and the first one I am choosing to discuss would be the financial burden that several of the proposed regulations would place on not only our facility but homes across the state. It is my belief that these proposed changes to the physical plant will not necessarily improve the health and safety of the resident but in fact will add more stress to their already frail conditions by imposing yet another financial burden upon them as the costs involved will undoubtedly be passed on to the resident. Specifically, Brevillier Village is dedicated to providing housing to those in financial need. These proposed regulations will significantly challenge our mission by increasing costs and making it virtually impossible for the low-income population to buy their way into our Assisted Living Facility or any facility within the commonwealth of Pennsylvania for that matter.

I am also concerned about some of the proposed regulations that place a significant amount of stress on the employees and administrators in Assisted Living facilities. The additional training and educational requirements appear to be above and beyond what is necessary. While I believe staff education and training is important, the additional time it will require to train people will also be valuable time taken away from caring for the residents. Staff will have to be removed from direct care duties to participate in training. By requiring support plans to be updated quarterly in addition to a change in a resident's condition places a huge paperwork burden on administrative staff which will result in a compromise of service as well. It is also cost prohibitive and unnecessary to require two



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qualified administrators be on the payroll at the same time. Our facility and many other facilities could not absorb these costs.

I am also concerned about the safety of residents. By requiring fire extinguishers to be placed in every living unit poses a risk to those individuals who have dementia. Residents who are cognitively impaired should not be attempting to extinguish a fire. This task should be left to firefighters and trained staff only. I also do not feel it is in the best interest of dementia residents to have a refrigerator or a microwave in their room. These appliances could pose a threat to their personal safety.

I would strongly recommend that you reconsider some of these proposed regulations and consult with PANPHA if possible. It is my hope that you will keep the residents care needs as the primary concern and to not lose focus of what really matters which is providing the highest quality of care for a resident at an affordable price. It is my hope that Brevillier Village can continue to stay committed to providing care to low-income residents. I am grateful for your time and thoughtful consideration and challenge you to do what is right for the elderly residents of Pennsylvania.

Sincerely,

BREVILLIER VILLAGE

A handwritten signature in black ink, appearing to read "Patty Curtin", with a stylized flourish at the end.

Patty Curtin
Social Worker