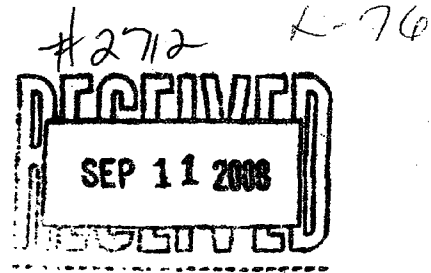


14-514



Reference: Proposed 2800 regulations, IRRC #14-514

I am the administrator of Mt. Hope Nazarene Retirement Community which consists of a 50 bed skilled nursing facility and 2 moderate income and 2 low income cottages. The current census of 50 skilled residents is composed of 6 private, 4 medicare and 40 medicaid. Our mission statement **"The Mt. Hope Nazarene Retirement Community is a 21st Century ministry center, offering hope and serving the local community and beyond by providing quality, loving care in an affordable, wholesome Christian environment as guided by Christ's model of care for "the least of these..."** dictates that we offer services to the moderate and low income people.

Our future plans here at Mt Hope include the construction of additional cottages, and an assisted living facility; however, if the new assisted living regulations go into effect it would not be possible for Mt. Hope to build a cost effective assisted living facility for the clients we have pledge to serve. The cost of construction for a 40 bed facility under the new regulations would be between 3.2 million and 3.8 million dollars in today's' market. This estimate will continue to rise. Mt. Hope and similar facilities could not afford to build such a facility and expect it to be cost effective for the low income elderly population. It is imperative to review the square footage requirement and allow a minimum of 150 square feet for new construction.

Other costs which the proposed regulations mandate and which would be difficult for a facility such as Mt Hope to absorb are:

1. 2800.11 (c) The \$500 licensure fee and the \$105 bed assessment. This would cost \$4,700 which we would not be able to pass on to our clients.
2. 2800.56 The regulation which requires the facility to have an individual who has the qualifications of an administrator to be present 24 hrs. a day.
3. 2800. 56 The regulation which requires all facility owned vehicles to be handicapped accessible if the facility plans to provide transportation services. Some clients will be able to be transported in vehicles which and not handicapped accessible and which would be less expensive to operate and maintain.
4. 2800.96 The regulation which requires an AED with every first aid kit will be expensive cost prohibitive, and not at all practical. This regulation should be deleted.

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The following are additional comments regarding the proposed regulations.

The amenities which a facility such as Mt. Hope can afford to offer to its clients are the development of relationships between residents, staff and family members. And it is through these relationships that care for the residents become meaningful.

The proposed assisted living regulations seem to place a heavy emphasis on physical amenities such as large bedrooms, additional rooms, expensive vehicles, equipment such as in-room sinks and refrigerators (2800.101(d), equipment such as AED's, mattress issue (2800.101(i), fire extinguishers in every bedroom (2800.131(a) along with numerous regulations which do not address care issues.

It may be that the large profit seeking organizations will look at the regulations and with a shrug of the shoulder simply pass on the cost of the amenities to their clients. At Mt. Hope we look at the proposed regulations and realize that part of our dream to provide cost effective services for our client base can no longer become real.

It would be helpful if the Assisted Living Regulations would address the legislature's intent of providing options to community based services as well as to providing access to assisted living facilities for all economic groups.

Sincerely,

Joseph G. Mraz
Administrator
Mt. Hope Nazarene Retirement Community
3026 Mt. Hope Home Road,
Manheim, Pa. 17545
(717) 665-6365 Ext 223
(717) 665-6366 (Fax)
jmraz@ptd.net