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INDEPENDENT REGULATORY  
REVIEW COMMISSION

2712

September 11, 2008

Gail Weidman  
Department of Public Welfare  
Office of Long-Term Care Living  
P.O. Box 2675  
Harrisburg, PA 17105

Arthur Coccodrilli, Chair  
Independent Regulatory Review Commission  
333 Market St, 14th Floor  
Harrisburg, PA 17101

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08 SEP 15 AM 10:33  
BUREAU OF LTC PGMS  
REFER TO

Dear Ms. Weidman and Chairman Coccodrilli:

We are the advocacy committee for ElderNet of Lower Merion and Narberth, a non-profit community organization. Our large volunteer corps helps older residents in our community. For many years, our organization has followed, with great interest, the Assisted Living legislation and regulations process.

Our Advocacy committee believes that the proposed assisted living regulations #14-514 do not ensure that Pennsylvania's elderly adults and persons with disabilities can be safely served in a home-like setting.

We have studied the personal care home rules as well, and we believe that the proposed assisted living regulations do not represent sufficient quality improvements to address some of the care needs of the assisted living residents they are intended to serve. The revisions made so far to the proposed regulations are significant and should be preserved in the final regulatory package. However, they are not enough to deliver on the promise of safely serving our loved ones in assisted living facilities.

**We support the important changes proposed by the Pennsylvania Assisted Living Consumer Alliance (PALCA)** to ensure that assisted living facilities are properly configured, staffed, and accountable, and to provide all residents with quality care. We ask that you fully adopt PALCA's 26 revisions to the regulation. These vital changes in

ElderNet of Lower Merion and Narberth is a not for profit, 501(c)(3) organization that was founded in 1976. ElderNet helps older and disabled adults remain living independently in their homes by providing free, practical, volunteer services such as escort driving, grocery shopping, telephone reassurance, and odd jobs. ElderNet also provides information, referrals, and emergency aid for adults of all ages.



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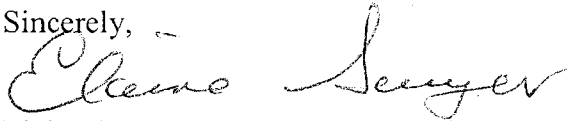
www.ElderNetonline.org

the interest of Assisted Living residents, *and they are residents – not just consumers*, must be regarded.

We are very concerned that *without the changes that PALCA has put forward, residents in Assisted Living will have to assume a buyer-beware consumer position, in order to live safely and with a sense of wellbeing when they enter a residence that should be their home, in every sense of the word.*

Thank you for considering our comments on this important matter.

Sincerely,

A handwritten signature in cursive script that reads "Elaine Swyer". The signature is written in black ink and is positioned above the typed name and title.

Elaine Swyer, MEd, CMC; Special Projects Director  
for the ElderNet of Lower Merion and Narberth Advocacy Committee