One Masonic Drive
Elizabethtown, PA 17022-2199
Phone: (717) 367-1121 X33752
Fax: (717) 361-5070

Services provided at:
Masonic Village at Elizabethtown
Masonic Village at Lafayette Hill
Masonic Village at Sewickley
Masonic Village at Warminster

A COMMUNITY OF THE MASONIC VILLAGES OF THE GRAND LODGE OF PENNSYLVANIA

September 12, 2008

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

Dear Ms. Weidman:

My name is William Davis and I am the Chief Operating Officer, Health Care Services, for the Masonic Villages of Pennsylvania. The Masonic Village at Elizabethtown is a continuing care retirement community (CCRC) offering 453 nursing beds, 127 assisted living beds, and 678 retirement living units. We have been a provider of senior services since 1910. Each year we provide approximately $9.9 million dollars in charitable, un-reimbursed Medicare and Medicaid services to our residents. I am extremely proud of our mission-driven organization, and the good we have done for so many unable to pay for the cost of their care. It is extremely troubling to me that we will now have new, imposed regulations for us to continue to be called assisted living. Close to 60% of our residents in assisted living are unable to pay for the cost of their care. This percentage is extremely high as we offer assisted living on a first come, first served basis, for those who need assistance regardless of their ability to pay. We are continually faced with increased costs for providing services. One of my concerns with these regulations is that they are creating unnecessary additional costs for us, which will ultimately limit our ability to continue to offer assisted living services to those unable to pay for the cost of their care.

Proposed regulation 2800.11—Procedural Requirements For Licensure Or Approval Of Assisted Living Residences
Currently our annual licensing fee for our personal care license is $50.00. Under the new assisted living regulations it would be $13,835, which is a 27,600% increase. This is the equivalent of 50% of one nursing assistant's wages.

2800.56—Administrator Staffing
This regulation doubles the number of hours the administrator must be present in the residence and does not account for vacations, holidays, and personal time, instead requiring the administrator's replacement of such hours to have the same training requirements as the administrator. This additional cost for training a second administrator to be available when the primary administrator is off, will cost us several thousand dollars per year since annual hours of training consist of at least 24 Department of Public Welfare approved hours. This is an unreasonable requirement for replacing the administrator during benefit time away from the job.

2800.96—First Aid Kit
It is unreasonable for a first aid kit to include an automatic electronic defibrillation (AED) device in first aid kits throughout the facility as these units should be separate from locations for first aid kits.
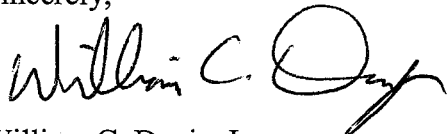
2800.101—Resident Living Units
Many of our residents in assisted living do not wish to have a small refrigerator or microwave in their unit as we provide three meals per day for them. For residents who want these appliances, they are currently available for them. However, requiring them as part of these regulations is well beyond minimum requirements.

2800.131—Fire Extinguishers
Fire extinguishers, when used properly, are a great asset to extinguishing fires in their early stages. Requiring a fire extinguisher be provided in each living unit in assisted living is not practical nor useful for our seniors who, in most cases, are unable to manage an extinguisher on their own. Our procedures require staff to respond quickly and extinguish fires in the early stages if possible.

Thank you for your consideration of my concerns regarding the proposed assisted living licensure regulations.

Sincerely,

William C. Davis, Jr.
Chief Operating Officer, Health Care Services
Masonic Villages of Pennsylvania

cek