Pennsylvania Association of Resources
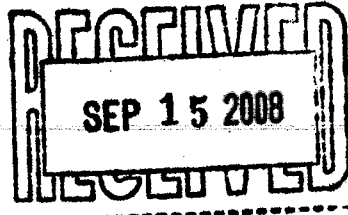for Autism and Intellectual Disabilities

2712

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September 10, 2008

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

Re: PAR Comments on Proposed Assisted Living Residences Regulations
Regulation No. 14-514

Dear Ms. Weidman,

Thank you for the opportunity to provide comments and recommendations on the above-referenced proposed regulations. The Pennsylvania Association of Resources for Autism and Intellectual Disabilities (PAR) is a statewide association whose members provide the full range of supports and services to more than 45,000 individuals with intellectual disabilities including 8,000 people living with autism in over 5,600 locations.

PAR is concerned that the grandfathering provisions included in the proposed regulations are not sufficient and could result in the disruption or discontinuation of valuable existing services. Several of our members provide services that would now fall under the scope of the proposed regulations, yet they do not meet the new requirements for assisted living residences (e.g. physical site modifications). Many providers, in light of the economic downturn and state funding cuts for many programs, simply will not be able to afford the costs of coming into full compliance with the new regulations. The adults currently receiving assisted living services as well as their families benefit tremendously from this service option and it would not be beneficial to anyone if their services were interrupted or discontinued.

For all of the reasons stated above, **PAR recommends full grandfathering of all provisions that would require housing modifications for <u>existing</u> assisted living residences that meet the definitions in the proposed regulations.**

Thank you for considering our comments and recommendations.

Sincerely,

Shirley A. Walker

Shirley A. Walker
President and CEO