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From: Kaufman, Kim
Sent: Monday, September 15, 2008 5:51 PM
To: Gelnett, Wanda B.; Jewett, John H.; Smith, James M.; Wilmarth, Fiona E.
Cc: Outreach
Subject: Fw: Proposed AL Regulations

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INDEPENDENT REGULATORY
REVIEW COMMISSION

FYI - and website

----- Original Message -----

From: Silva Gerety <sgerety@sheltergrp.com>
To: Kaufman, Kim
Cc: Brian Engle <bengle@bvsl.net>; Jon Tapner <jtapner@bvsl.net>; Executive Director
Brightview East Norriton <mleventon@bvsl.net>
Sent: Mon Sep 15 16:57:57 2008
Subject: Proposed AL Regulations

Ms. Kim Kaufman

Executive Director

Independent Regulatory Review Commission

333 Market Street, 14th Floor

Harrisburg, PA 17101

Dear Ms. Kaufman:

The following is submitted on behalf of Brightview Senior Living in response to the proposed Assisted Living Residence Regulations. As a Registered Nurse and a Licensed Nursing Home Administrator, I am concerned that many of the proposed regulations are unnecessary, impractical; will increase costs; and limit access to consumer seeking Assisted Living Residences Services:

1. 2800.11 - Licensure & Bed fee requirements: The proposed increases in licensure and per bed fees are excessive and will create financial hardships for providers and place an undue burden on those already struggling with the sharp increases in the cost of fuel, electricity, food and high cost of living.
2. 2800.220 - Assisted Living Core Services: A residence should have the option to bundle or unbundled specific core services. Transportation requirements should not mandate that ALL vehicles need to be handicapped accessible.
3. 2800.225 - Initial; Annual & Quarterly Assessment & 2800.227 Development of Support Plan:
 - a. An LPN is able to gather data; develop and complete Initial and annual assessments and support plans. The requirement that this needs to be done under the supervision of a Registered Nurse will result in additional costs for the residence - and Residents.
 - b. Move in; 6 month; annual and significant change assessments and support plans more than adequately addresses the timely identification of the service needs of Residents. Quarterly assessment and support plan revisions are unnecessary - if changes have occurred they will be identified and addressed by the significant change assessment requirement.
4. 2800.183 - Storage and Disposal of Medications: The residence should be permitted to dictate the fashion in which prescription drugs are packaged and delivered.

5. 2800.96 - First Aid Kit: Automatic electronic defibrillation devices should not be a required content of First Aid Kits.
6. 2800.131 - Fire Extinguishers: Fire extinguishers should not be required for each living unit
7. 2800.64 & 2800.65 - Training: Educational requirements are above and beyond other State Assisted Living requirements.

Thanks you for making Assisted Living a new option for Pennsylvania consumers and Thanks in advance for your thoughtful consideration of our comments.

Silva K. M. Gerety

Silva K. M. Gerety

MPA; MSN; RN; NEA-BC; NHA

Corporate Director of Health and Wellness

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