

This document is a comment on the preliminary DRAFT final regulation. On June 24, 2009, the Department of Public Welfare provided a DRAFT final regulation for public review and comment. The DRAFT final can be found at : <http://www.irrc.state.pa.us/Documents/SRCDocuments/Regulations/2712/AGENCY/Document-12700.pdf>.

This is an informal process. The Department will consider these comments in preparation of a formal final regulation to be submitted at a later date.



Saint Mary's Home of Erie

Caring across the Centuries  125 years

2712

SAINT MARY'S AT ASBURY RIDGE
SAINT MARY'S EAST

July 22, 2009

The Honorable John M. Hall
Secretary, Department of Aging
Office of Long-Term Care Living
Bureau of Policy and Strategic Planning
P.O. Box 2675
Harrisburg, PA 17105

Dear Secretary Hall:

I have read with interest the Proposed Assisted Living Residence Regulations and Panpha's Response to them. Please reconsider the following as they specifically impact Saint Mary's Home of Erie d/b/a Saint Mary's East:

- The fees set forth in 2800.11 are prohibitive; in our case the annual licensing fee would be upwards of \$10,000. This cost toward licensing would impact greatly on our Residents as to their care if Saint Mary's East shouldered the cost or to their costs if Saint Mary's were to add licensing costs to their fees;
- The square footage requirement of 175 sq. ft. per room would impact Saint Mary's East greatly. Some of our rooms do not have this capacity (we can meet the 125 sq. footage which Panpha is requesting). Further, our facility is located in an area which serves many low income persons, meeting this requirement would be prohibitive to many who need and desire our care. At present, under the personal care regulations Saint Mary's Home of Erie provides almost \$600,000 annually in Benevolent Care
- Dual licensing has many positive features. Saint Mary's East requests that those Residents in need of and requesting Personal Care be permitted to be served under dual licensing in the same manner that they are serviced at present.

We believe that Act 56 provides opportunities for Residents which are of great value. However, the final regulations, as they exist today, will prevent access to Assister Living Care for many, given our present building structure.

Thank you for your cooperation in this matter.

Sincerely,

Mary Fromknecht SSJ
Administrator
Saint Mary's East

cc. Bill White – Bureau of Policy and Strategic Planning
Independent Regulatory Review Commission ✓
Senator Pat Vance
Representative Phyllis Mundy
Senator Jane Earll
Representative Patrick J. Harkins