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INDEPENDENT REGULATORY
REVIEW COMMISSION

Office of Long Term Living
Bureau of Policy and Strategic Planning
P.O. Box 2675
Harrisburg, PA 17105
Attention: Bill White

Re: Comments on Interim Draft of Proposed Regulations for Assisted Living

I am writing to support the comments submitted by the Pennsylvania Assisted Living Consumer Alliance regarding the interim draft of the proposed regulations for assisted living in Pennsylvania. I would also like to say that while these proposed regulations represent significant progress, there is still work to do. As PALCA points out in their thorough comments, more needs to be done to protect Pennsylvania's seniors.

As a faculty member at Ursinus College who has spent the last seven years engaged in research related to ethics and marketing in the assisted living industry, I look to your Office to take the lead in making Pennsylvania a model for the rest of the country in regards to appropriate and effective regulatory oversight of this sector of the long term care industry. As the country moves toward health care reform generally, please do not forget that how facilities market their services matters a great deal because consumers typically make the decision to move to assisted living in a crisis, time-urgent situation and have inadequate information. Unlike other industries where readily available measures of quality are accessible to consumers, the assisted living industry is a prime source of information for consumers – for this reason, I urge you to consider adding language related to marketing practices. Finally, none of the drafts of the proposed regulations have included language that requires facilities to institute formal procedures or systems that foster ethical decision making. I would also like to see such language incorporated into the final regulations.

Thank you for your attention and for the opportunity to comment.

Carol C. Cirka, PhD

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