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Elaine Smith
OLTL, OM AP/PDA

cc: Jennifer Whare
OGC

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

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RE: Proposed Assisted Living Residence Regulatory Concerns

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Secretary Hall:

I would like you to please consider my following concerns with the proposed regulations:

Licensure Fees

The newly proposed \$300 initial application fee coupled with the per bed fee of \$75 still results in a significant burden on the provider

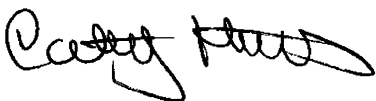
Administrator Requirements

The Department does not wish to set the minimum bar for Assisted Living Residences at requiring a fully trained to standard Administrator 24 hours a day 7 days per week, but rather have a qualified person as the Administrator designee.

Supervision by RN in Assessment and Support Plan Development:

An RN is not a clinical necessity in the completion of an Assessment or in the development of a Support Plan. This is a mandate that simply increases the cost profile of delivering care. A provision that mandates that an RN review Assessments and Support Plans for accuracy may be reasonable, but to require direct supervision during the completion is not warranted.

Sincerely,



Cathy Himes, PCHA
Personal Care Home Administrator
Laurelbrooke Assisted Living
133 Laurelbrooke Drive
Brookville Pa. 15825
814-849-0470