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Mowery, Brian

From: Rob Khanuja [rkhanuja@phoebe.org]
Sent: Friday, July 10, 2009 10:52 AM
To: PW, asstdliving
Cc: Mark Miller
Subject: AL Regs

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INDEPENDENT REGULATORY
REVIEW COMMISSION

To Whom It May Concern:

I have just completed reviewing the proposed Assisted Living regulations, and am pleased to see that many of the items that were discussed last year have been revised. My primary disappointment with the new proposal refers to regulation 2800.56 – Administrator Staffing.

Requiring that the administrator be present for an average of 40 hours per week sounds reasonable, however, I would question how that would impact the 20 hour requirement called for in the Personal Care Home regulations. It seems like in the beginning, it would have been feasible for an administrator to preside over both an AL and a PCF facility. If the hours cannot count for both, then this regulation would eliminate that possibility. Also, requiring that the "designee" have the same qualifications as the administrator will put a financial strain on facilities that will now be required to ensure that more than one person attends all of the licensure training, and also the annual continuing education. This seems unreasonable, and even goes beyond what the DOH regulations call for in skilled nursing.

I appreciate your understanding of this concern, and would be willing to discuss with anyone who would seek additional information.

Sincerely,

Rob S. Khanuja
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 Phoebe Berks Village & Health Center
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