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September 12, 2008
Newville, Pennsylvania 17241

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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08 SEP 16 PM 12:21
DIR OF LTC PGMS
REFER TO _____

Gail Weidman
Office of Long-Term Care Living
Bureau of Policy and Strategic Planning
Pennsylvania Department of Public Welfare
P.O. Box 2675
Harrisburg, PA 17105

Dear Ms. Weidman:

We write to express our concern about the overly stringent proposed regulations for licensing assisted living facilities. As residents living independently at Green Ridge Village in Newville, we have both personal and community interests in this issue.

There are two facilities on our campus where residents live with help in activities of daily living, Carriage Courts in Swaim Hall and Gilliland Manor. Swaim's facilities present no structural obstacles to obtaining a license under your proposed regulations because it is a relatively new building. Gilliland Manor was completed in January 1941. Then it was an innovative dwelling designed for central Pennsylvanians to age in place, built at a time when most similar residences were converted mansions of wealthy benefactors. The Manor is a beautiful stone structure with 22-inch walls and large windows overlooking an idyllic rural landscape, but it will be impossible to fully utilize the building as an assisted living residence under your proposed rules.

Why? Eight rooms cannot meet the requirement to have 175 square feet for each individual unit. Even an expanded dining room, for which a capital campaign has recently raised funds, cannot meet the requirement of 15 square feet for each person. Presently rooms at the Manor cost less than those in Carriage Court, so they meet the needs of residents whose savings are modest. Furthermore, some prefer to live in the Manor. As residents of Green Ridge Village who may need to move to assisted living in the future, we deeply resent the prospect of either losing Gilliland Manor as an option or of having everyone in our community have to pay an enormous levy to keep it open with an assisted living license.

Even for the parts of our campus that would qualify structurally for the assisted living license under these proposed regulations, their cost would impose to meet new licensing costs, staffing costs, and vehicle costs are prohibitive. These changes would not result in qualitatively better care for residents. Instead they would make the expense of such facilities prohibitive for many people of modest income. Most of our current independent living residents have more than average means when we move to this community. But the attrition of inflation on stable income pensions and annuities creates a strain we all feel as we pay the necessarily increasing costs of

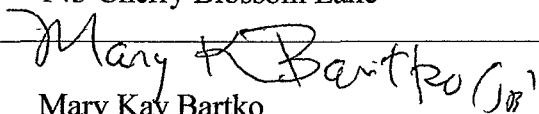
living at Green Ridge Village. To impose a staggering sum of \$728,255.00, the estimate of our administration for initial compliance with the regulations, and then commensurate annual increases, is deeply distressing to us. This was not the intent of Act 56, which we believe was meant to improve the quality of life for elderly citizens by guaranteeing safe alternatives for us as we age.

We hope you will consider these comments as you formulate the final regulations.

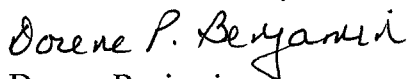
Sincerely,



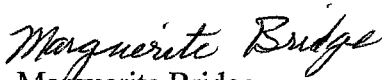
John Bartko
143 Cherry Blossom Lane



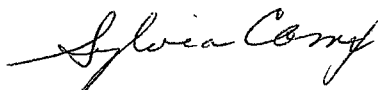
Mary Kay Bartko
143 Cherry Blossom Lane



Dorene Benjamin
73 Oak Circle



Marguerite Bridge
92 Locust Trail

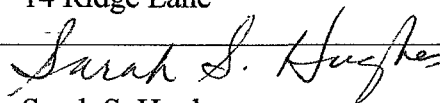


Sylvia Camp
40 Hemlock Circle

cc: Senator Pat Vance
Representative William I. Gabig
Independent Regulatory Review Commission

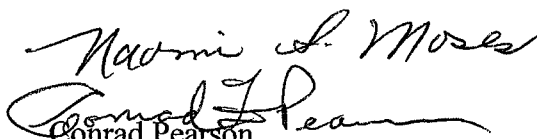


Brady Hughes
14 Ridge Lane



Sarah S. Hughes
14 Ridge Lane

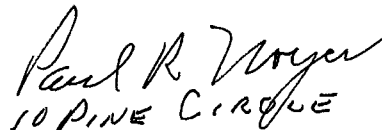
Naomi Moses
10 Ridge Lane



Conrad Pearson
153 Dogwood Lane



Kathy Pearson
153 Dogwood Lane



10 PINE CIRCLE