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Honey Brook, PA 19344

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9/12/2008

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Mr. Arthur Coccodrilli  
Independent Regulatory Review Committee  
333 Market Street, 14<sup>th</sup> floor  
Harrisburg, PA 17101

Re: Proposed 2800 Assisted Living Regulations

Dear Mr. Coccodrilli,

Following you will find my comments in regard to the above mentioned regulations. Tel Hai Retirement Community is a not-for-profit organization that strives to provide quality of life for all of our residents. I am concerned about increased costs associated with the changes in regulations for our residents. We would need to pass along the increased cost to the residents. I appreciate the efforts to make quality care available for all seniors. However, there must be a way to do this without making the care unaffordable to those who need it most.

2800.11

A \$105 per bed fee is an extreme hardship for our community. This would cost our facility \$11,000 a year (including application fee). Monies that we all would agree would be better spent on the residents. Under the current 2600 regulations, our facility would pay only \$3,000 for the license.

2800.56

The administrator's presence in the home 40 hours or more per week does not allow time for continuing education, off campus evaluations, hospital visits, or vacation. It would also be a great expense and hardship for communities to train the designees as an administrator. Our nurses serve as designees when the Administrator is out of the office. They are qualified to handle any issues that arise. Educating additional person(s) to the training level of the administrator would offer a definite hardship to our facility.

2800.57(a)

The designee identified in this point should not need to have the training of the Administrator.

2800.61

Infrequently, we use CNA agency staff to fill in for regular staff. It would be difficult to train them as specified in 2800.65. We do however use pool staff on and off that are trained in accordance with the regulations. Would it be possible to make exception for agency staff or staff used very short term.

2800.96

Our facility has multiple first aid kits. We do have an AED in our retirement community. It would be a hardship and great expense if an AED was required with each kit.

2800.101

While we do have a full kitchen available to our residents in our activities department as well as a community microwave, sink, and refrigerator on each floor, we do not have one in every room. It would not only be a financial hardship to the facility; but some residents would be a danger to themselves and others with a microwave.

2800.131

We have fire extinguishers throughout our facility that are routinely maintained. Placing fire extinguishers in every living unit is an unnecessary measure. Residents could be injured by the fire extinguisher or worse. Staff is trained to take an extinguisher with them to the rooms when the fire alarm sounds. Residents are trained to alert staff in an emergency but may take it in their own hands to battle a fire if an extinguisher were in their room.

2800.171

We own and operate numerous vehicles. This requirement for handicap access should be limited to one vehicle. Having all handicapped accessible is not needed in a CCRC

2800.220

The list of core services is open to interpretation. Specifically it does not address if the fee for these services can be unbundled or must be bundled.

2800.228(h)(3)

The facility must be permitted to maintain control of transfers and discharges. The Ombudsman should not be included in this type of decision-making. The ombudsman should be a resource for the resident, not their legal representative.

2800.231

We do not have a special care unit for residents with dementia. Looking at the regulations would discourage me for offering this valid level of care to our CCRC as the requirements are so ominous.

Thanks for your consideration of my many concerns. Your commitment to the senior population is greatly appreciated.

Sincerely,

Teresa Long, RN, NHA  
Vice President Health Services  
Tel Hai Retirement Community