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2008 SEP 23 PM 1:53

231 Conway Ave.
Narberth, PA 19072
September 13, 2008

Gail Weidman
Office of Long Term Care Living
Dept of Public Welfare
P.O. Box 2675
Harrisburg, PA 17105

INDEPENDENT REGULATORY
BOARD

RECEIVED
08 SEP 17 AM 11:30
LIC PGMS
REFER TO _____

Re: Proposed Assisted Living Regulations - 14514

Dear Ms. Weidman:

My comments by section are as follows. My interest is that my mother, who is 89, is currently in a PA assisted living facility.

2800.4 – Definitions.

Relative – Cousins should also be included for people like me who are unmarried, have no siblings, no children, and may not have any aunts or uncles. Also, there should be accommodations for gay partners.

Section 2800.54(a)(2) – Qualifications for direct care staff persons.

Could there be exceptions for people like Amish or Mennonites or immigrants who might not have high school diplomas but could be great caregivers?

Section 2800.60 (d) – Additional staffing.

I'd prefer that a nurse be on site at all times, not just on call.

Section 2800.83(c) - Temperature.

If there's central air conditioning will it be possible for each apartment to control its own temperature? If not, that's a bad thing. Older people like warmer temperatures than the younger staff might like in their areas.

Section 2800.101(d)(2)(iii) – Resident living units. & Section 2800.103(a) – Food Service

Why does there need to be a food prep area in a common area? That doesn't seem to be necessary with a kitchen for the prep of common meals and some cooking facilities in resident apartments.

Section 2800.101(j)(1) – Resident living units.

Are all mattresses sold in the US fire retardant? Residents should be able to bring their own mattress if they want to.

Section 2800.101(r) – Resident living units.

Is an emergency notification system necessary if all residents have necklace or bracelet notification systems?

Section 2800.102(i) – Bathrooms.

I suggest a rewording to make it clear that a soap dispenser is not needed if a bathroom is not shared.

Section 2800.108 – Firearms and weapons.

Just don't allow any firearms in! Don't listen to the NRA! If someone needs to be in assisted living do you really want them to be handling a gun?

Section 2800.143(b) – Emergency medical plan.

Also include food sensitivities (like sensitivity to wheat or soy or milk products).

Section 2800.171(b)(5) – Transportation

Do you really mean to require that any vehicle transporting residents must have a defibrillation device?

Section 2800.183(a) – Storage and disposal of medication.

Why the 2-hour restriction? It seems that preparing pills is something that could be done by overnight staff. That would be a good use of their time. Also, does this prohibit the use of pill sorting boxes? What about blister packs?

Section 2800.183(f) – Storage and disposal of medication.

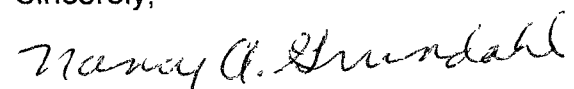
Requiring destruction of medicine does not allow for a recycling option, like giving that medicine to others who might use it whether in this country or in another country, or donating it for veterinary use.

Section 2800.187 – Medication records.

Also include food sensitivities to substances like wheat or soy or milk products. For instance, Vitamin E is often made from soy and will cause a reaction in persons with sensitivity to soy.

Thank you for the opportunity to comment.

Sincerely,



Nancy A. Grundahl