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INDEPENDENT REGULATORY

Department of Public Welfare
Assisted Living Residences
Regulation NO. 14-514
September 11, 2008

Public Comment:

Assisted Living Residences are often the place where people go when they cannot live alone or in their own residence and before they are so disabled that they need nursing home care. It can also be the location people go to nursing homes before returning their home and community. Since many people who have a hearing loss do not seek treatment or use hearing aids, cochlear implants, or assistive listening devices and alerting devices or dogs so they can remain in their own residence, it is critical that the assistive living residences evaluate applicants and members for needs and teach them and staff how to meet those needs.

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In general, hard of hearing people are not aware of their hearing loss or the existence of hearing assistive devices and their effective use to improve awareness and accessibility to acoustic signals. Similarly, staff of assisted living residences are not aware of such or have training so they can effectively communicate with and provide for the inclusion of residents with hearing loss in activities.

2800.66 Staffing

There will be a staff training plan that includes retraining on at least a yearly basis of all staff regarding hearing loss, including the identification, use, and maintenance of hearing aids, cochlear implants, assistive listening systems, captioned telephone, alerting systems and hearing dogs, and other technology for people with hearing loss.

2800.90 Communication Systems

If a public announcement system is utilized which most people with hearing loss cannot understand, then an alternate communication system will be provided for people with hearing loss. An analog line for captioned telephone, telecommunication device for the deaf, or computer will be made available for people who want to use telephone relay, captioning or video relay system. Alerting systems such as flashing doorknockers will be made available. Televisions will have captioning.

2800.109 Pets

Animals are critical to the well being of people. For people with hearing loss and or other disabilities, service dogs and hearing dogs are allowed under the Americans With Disabilities Act. This should be specified in order to reduce misunderstandings.

2800.130 Fire Safety

It is good to see the regulations specify that alternate modes of fire safety will be provided if the resident cannot hear a fire alarm. Since most residents will have a hearing loss, strobe flashing lights are important in all areas. Make note that recent research has indicated that people with hearing loss are not awakened from sleep by flashing strobe lights and may need vibrating devices.

2800 140 Medical evaluation and 2800.224 Pre admission screening

A third of the people over the age of 60 have a hearing loss yet they likely ignore it and their physicians are unlikely to have done a screening. It is critical that the preadmission screening detail a screening for hearing loss and also the needs of the candidate regarding participation in activities, communication modes, response to alerting devices, and method of telecommunication communication. Devices are available for free to low income people and such attention to accommodations may ensure the individual stays alert, healthy, and satisfied. In most cases, it is likely no one has ever addressed the individual's communication needs. A Policy statement from the Hearing Loss Association of America (www.hearingloss.org) regarding Hearing Assistance Technologies is attached.

Thank you.

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