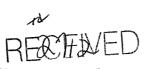9896 Bustleton Avenue • Philadelphia, PA 19115 • (215) 934-3000 • Fax (215) 934-3018 • www.paulsrun.org

September 12, 2008
Gail Weidman
Office of Long Term Living
Department of Public Welfare
6th Floor, Bertolino Building
Harrisburg, PA 17102

Dear Gail Weidman:

Comments regarding the proposed rulemaking Reference Regulation 14514.

Keys areas of concerns on the proposed regulation:
- A. Licensure Fees
  - o The new fee structure of $500 licensure fee plus $105 per bed is going to have especially financial burden on many providers.
- B. Services
  - o No service options , unclear if bundling is the only option
- C. Administrative Requirements
  - o Administrator or an individual with the training of an Administrator to be present 24hrs a day 7 times a week, Needs clarification
  - o Credentials – not accepting NHA's and or grandfathering is another obstacle especially on good facilities
  - o Time Requirements – Requiring Administrator 40hrs a week in the facility is excessive. Question – since PC and AL are under one roof does this mean 2 Administrators
- D. Physical Plant Requirements
  - o Proposed square footage requirements of 175 square feet for existing 250 per living unit for new construction is excessive and not safe: Additional space means higher expense to residents and greater risk of falls
  - o Full functional kitchens safety issues, besides we are required to provide 3 balanced meals
- E. Supervision of RN's Assessments and Support Plans
  - o A LPN clinical skill is more than adequate to do own supervision for Assessments and Support Plans. The requirement for 4 times a year is very time consuming. It is already required to do one upon any change now; an additional 3 times annually is not a necessity.
- F. Pharmacy Prescription Drug Accountability
  - o Not permitting facility to control medication regimen forces us to accept drugs from any source which is not only a safety issue for residents but also staff.

I appreciate the opportunity to offer comments.
Sincerely,

Bridget McGinn

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