



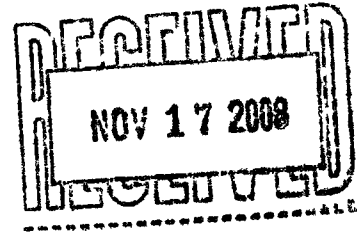
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Graceful and Successful Aging  
November 11, 2008

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(215) 643 6333 ♦ Fax (215) 643 0960 ♦ www.artmanhome.com

Gail Weidman  
Office of Long Term Living  
Department of Public Welfare  
6<sup>th</sup> Floor, Bertolino Building  
Harrisburg, PA 17102

2712



Dear Ms. Weidman,

Please accept our comments regarding the proposed rulemaking Reference Regulation 14514

Keys areas of concerns on the proposed regulations include:

- A. Licensure Fees
  - The new fee structure of \$500 licensure fee plus \$105 per bed is going to have especially financial burden for us as this charge for our 123 bed facility would be over \$ 13,000.
- B. Services
  - No service options , it is unclear if bundling is the only option
- C. Administrative Requirements
  - Designed as 24hrs a day 7 times a week, Need clarification on this stipulation
  - Credentials – not accepting NHA’s and or grandfathering is another obstacle especially on good facilities
  - 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
  - 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
  - Full functional kitchens proposes safety issues is to residents, besides we are required to provide 3 balanced meals to our residents.
- E. Supervision of RN’s Assessments and Support Plans
  - 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
  - Not permitting facility to control medication regimen forces us to accept drugs from any source which is not only a safety issue.

Thank you for your consideration.

Sincerely,

Kim Biletz, RN  
Assistant Director of Nursing

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