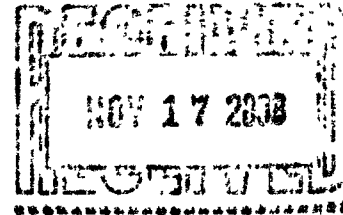


Graceful and Successful Aging
November 11, 2008

250 N Bethlehem Pike ♦ Ambler PA 19002
(215) 643 6333 ♦ Fax (215) 643 0960 ♦ www.artmanhome.com

Gail Weidman
Office of Long Term Living
Department of Public Welfare
6th 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,


Nancy Twomey, NHA
Personal Care Administrator

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