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May 4, 2012

Mr. Silvan Lutkewitte, III, Chairman
Independent Regulatory Review Commission
14th Floor
333 Market Street
Harrisburg, Pa. 17101

Dear Chairman Lutkewitte:

Re: Pennsylvania Department of Public Welfare Final Regulation #14-524

The Pennsylvania Association of County Affiliated Homes (PACAH) is pleased to offer our support for the above referenced regulation pertaining to the Participation Review Process for Medical Assistance Nursing Facilities. PACAH represents about 80 different nursing facilities in the Commonwealth, including all of the county-owned facilities, as well as a number of not for profit and for profit facilities. PACAH is an affiliate of the County Commissioners Association of Pennsylvania.

These regulations are long overdue and will assist in controlling an increase in the number of Medicaid licensed nursing facility beds in the Commonwealth, while at the same time providing guidelines for bed transfers among facilities. PACAH is also supportive of the changes made from the proposed regulations with respect to the process that a Continuing Care Retirement Community (CCRC) must follow, requiring them to abide by the same processes as other nursing facilities.

Once again PACAH supports these regulations and urges their approval.

Sincerely,

Michael J Wilt
PACAH Executive Director

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An Affiliate of the County Commissioners Association of Pennsylvania