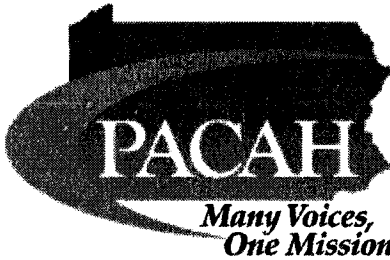


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IRRC

2010 DEC -2 P 1:27

December 2, 2010

Yvette-Sanchez-Roberts
Bureau of Policy & Strategic Planning
Department of Public Welfare
Department of Aging
Office of Long Term Living
555 Walnut Street
5th Floor
Harrisburg, Pa. 17101-1919

Re: Regulation No. 14-524

Dear Ms. Roberts:

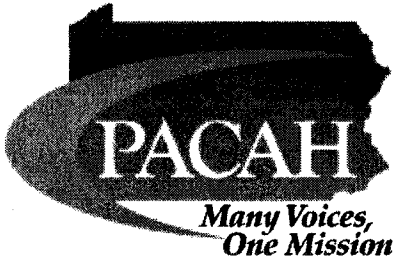
PACAH, a long-term care nursing home association representing approximately 80 nursing facilities, including all county operated facilities, appreciates the opportunity to comment on your proposed regulations describing the Participation Review Process for Medical Assistance Nursing Facilities (IRRC #2880). PACAH is an affiliate of the County Commissioners Association of Pennsylvania.

PACAH, as a general statement, does not support the addition of any Medical Assistance (MA) nursing facility beds in the Commonwealth. This is regardless of whether they are at a free standing facility or a closed Continuing Care Retirement Community. The current financial payment system to nursing facilities for the care of the Medicaid resident is already underfunded and any increase in beds will only further erode those payments. Adding beds to a system that can not cover the current costs is not good public policy and is financially detrimental to existing MA facilities. There should be a moratorium on any new Medicaid licensed beds in the Commonwealth until such time as an adequate payment/reimbursement system is established. Therefore we urge the Department to withdraw all sections of this proposed regulation that refer to the addition of licensed Medicaid beds either at a nursing facility or a CCRC.

PACAH supports the concept of bed transfers between facilities and agrees that a facility receiving the MA licensed beds should be held to an established minimum MA occupancy level. Population and demographic shifts within Pennsylvania do

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occur and the Commonwealth and interested nursing facilities should have the ability to negotiate bed transfers.

PACAH once again appreciates the opportunity to comment on these proposed regulations.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Wilt". The signature is written in a cursive style.

Michael J. Wilt
Executive Director

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