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2010 DEC -Ь Р 3: 55 December 1, 2010

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

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Re:

Regulation No. 14-524

Dear Ms. Sanchez-Roberts:

As a continuing care retirement community (CCRC) resident in Pennsylvania and on behalf of the residents association at Maris Grove representing 1260 people, I would like to express our strong support for your proposed effort to allow CCRCs to, in certain circumstances, access Medicaid beds. In some cases, the current rules can result in physically and psychologically unhealthy outcomes resulting from forced displacement. It is our hope that your proposal would allow Maris Grove to participate thereby mitigating this horrible circumstance.

As you may know, residents like me make a commitment upon entering a CCRC like Maris Grove to 'spend down' our personal assets in order to ensure that Medicaid is the payer of last resort. We believe that the CCRC model is important because it provides us with an attractive way to finance our end of life care without seeking public assistance. Further, our community has established a benevolent care fund in order to help defray the costs of serving our friends and fellow residents that may not have the resources to cover their costs as they age. The benevolent care fund creates an added protection to reduce the need for public assistance in all but the most dire of circumstances.

Nevertheless, in some cases residents do become indigent. Because communities like Erickson commit to never remove a resident due to lack of ability to pay, the costs associated with long term care for seniors are born by both Erickson and residents—which has the unintended consequence of accelerating the rate at which residents qualify for assistance or pricing out those who may have tried to privately finance their end of life care.

An even worse outcome results where indigent seniors must move from a CCRC into an off-site nursing home for financial reasons—a move that often results in negative social and physical outcomes; such as the splitting of a married couple.



Again, we applaud the proposed rule change because it recognizes that CCRCs are a viable and necessary compliment to the long term living system. They help to ensure proper and full use of private dollars before a request for assistance is made to the Medicaid Program.

Thank you for your consideration of our comments. If you have additional questions, I would encourage you to visit us in person at Maris Grove.

Most Sincerely,

Barbara M. Creighton
Barbara Creighton

Chair, Resident Advisory Council

610-558-1551

Walter Copper

Vice-Chair, Resident Advisory Council

Eleanor Davis, Secretary Resident Advisory Council

Hazel Gregory, member Resient Advisory Council

Josh & Gran

Joseph O'Grady, member Resident Advisory Council

Joseph Peronace, member Resident Advisory Council

John Caskie, member Resident Advisory Council

Peg Showalter, member Resident Advisory Council

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