



Pennsylvania Assisted Living Association  
336 South State Street  
Clarks Summit, PA 18411

To: THE HONORABLE SENATORS OF PENNSYLVANIA

From: Edward J Corbeil, President, The Pennsylvania Assisted Living Association

Date: July 11, 2007

**Re: Senate Bill 704**

As each of you undertake the immense responsibility of ensuring the health, welfare, safety and happiness of Pennsylvania's seniors residing in personal care communities across the state, I urge each of you to consider the following question, once Senate Bill 704 passes, and another level of regulation is created to oversee Assisted Living facilities, how will personal care homes be regulated? For the past two years providers of all sizes, both for profit and not-for-profit have endeavored with great earnest to comply with the new 2600 PCH Regulations which became effective on October 24, 2005. Throughout this period, hundreds of thousands of dollars have been spent on capital budget improvements to ensure physical site compliance and even more operational budgets have been exhausted in trying to keep up with hiring fire safety experts, providing excessive training to administrators and direct care staff, and answering to the ubiquitous and incalculable regulatory interpretations issued by The Department of Public Welfare. It is important to note that there have been three re-writes of the "Licensing Measurement Instrument" in the past 10 months. It is also not uncommon for DPW surveyors to show up at home inspections with thick folders of inter-office emails containing directives on interpretation. Unfortunately, many of these regulatory interpretations are not only arbitrarily devised, but they are also NOT shared with the 1,500 providers across the commonwealth. How can providers be expected to serve our most vulnerable populations without the correct information?

Given these incredible and still uncertain circumstances, I implore you to consider in SB 704 how exactly personal care homes will be regulated if assisted living licensure is created. PALA is not suggesting that separate licensure for assisted living is unwanted or not warranted. Assisted Living is recognized and regulated in all 50 states. Pennsylvania will demonstrate its leadership by carving out Assisted Living and permitting these communities to serve residents of higher acuity or those who simply wish to exercise their free will and choose to reside in an assisted living facility. However, in so doing I ask you to consider the number of providers, who have struggled mightily in their attempts to comply with the 2600 PCH Regulations. Many of these small to medium size companies have been handed down from generation to generation. In many instances, they are the very fabric of small business in our state and deserve every opportunity to continue to serve seniors in the safe and effective environment and manner that they have demonstrated for years. Personal Care Homes should be regulated, no doubt. The previous regulations, series 2620, were not 100% effective in assuring optimum quality care. However, they did serve the personal care home industry in the state for over 20 years. Using the 2620 Regulations as a baseline and building in reasonable upgraded standards for both safety and training would most certainly be the most just and admirable strategy to provide the residents of personal care home facilities. It will also preserve the existence of many family owned and operated communities across Pennsylvania. 85 personal care homes have closed their doors in the past two years because of their inability to keep up with excessive regulations and capricious interpretations. Please do not allow the continued disruption of lives of people who only seek to live out their remaining days in peace. Preserving our state's personal care homes will also safeguard employment for employees making a difference in the lives of vulnerable populations throughout the commonwealth.

As always, I thank you for your kind consideration and will make myself available to answer your questions and concerns.

Sincerely,

**Edward J. Corbeil**

Edward J. Corbeil  
President