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To: HCBCTransitionplan@dhhs.state.nh.us
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Date: 02/12/2015 11:23 AM
Subject: Public comment for Draft Transition Framework for Establishing
CFI Compliance

Hello Deb,

We have great concerns about the cms requirements regarding

- locked doors
- food available at any time
- choice of roommate

Our assisted living home is fairly small (we have eleven residents) and we provide a family style environment. Locking doors for privacy needs is not necessary, it poses even risks to our residents in case of emergencies. What happens when a resident is in need of help, but the door is locked? Having to have food available at all times would require additional staffing (ie. when a resident decides to have a complete dinner at midnight) and is impractical.

What does choice of roommate mean? Would a current cfi resident in a semi-private room have the right to refuse a certain new roommate (and why should s/he have that right compared to a non cfi resident?)

Current rules (here He-P 805) do not place cfi residents in a better position than non-cfi residents. The new cms regulations do exactly that, provide residents with more rights than non-cfi residents. We could probably understand this position if the cfi rate was substantially higher than the private pay rate (you pay more, you get more). However, in reality the cfi rate is way lower than the private pay rate. Therefore cfi residents should not be treated better, but equal to private paying residents.

We ask the department to work in the interest of providers that offer cfi beds.

Thank you

Alex Amann, Co-Administrator
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