



February 11, 2014

Commonwealth of Pennsylvania
Pennsylvania Department of Public Welfare
Office of Long-Term Living
Bureau of Policy and Strategic Planning
Forum Place – 5th Floor
555 Walnut Street
Harrisburg, Pa. 17101

Re: Bed Expansion request #JD13004

To Whom It May Concern:

I am writing this letter in opposition to the proposed 85 bed expansion request referenced above. This letter is written on behalf of the Pennsylvania Association of County Affiliated Homes (PACAH), which represents all of the county nursing facilities in the Commonwealth, as well as a number of for profit, not for profit and veterans' nursing facilities. PACAH is an affiliate of the County Commissioners Association of Pennsylvania.

Adding more Medicaid beds into a system that is already underfunded is not prudent or necessary at this time. Currently, the Medicaid payment rate to nursing facilities is not enough to cover their expenses. For the past four years payment rates have only been increased by 2 percent, which does not cover the increased cost of providing care. This has led to many facilities having to face painful budgetary decisions just to allow for the continued operation. In addition, the proposed applicant has not demonstrated a need for these additional beds in Philadelphia County. A review of the current census/occupancy rates of other facilities in Philadelphia County and adjoining counties does not indicate any need for these additional beds. Therefore we urge you to reject this application. If you have any questions feel free to contact me. Thank you for the opportunity to comment.

Sincerely,

17 North Front Street, Harrisburg, PA 17101
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An Affiliate of the County Commissioners Association of Pennsylvania