Please oppose this petition as is creates a biased playing field and limits competition.

The Petition does not meet the basic requirements for a petition seeking a policy change, as set forth in the 2018 State Medical Facilities Plan ("SMFP").   Where is the data showing the need for this change?

The Petition raises a host of patient care and regulatory compliance problems and is inconsistent with the Basic Principles. The Petition states that it intends to limit competition. The Petition does not adequately address the serious concerns with providing home health services and meeting the Medicare Conditions of Participation with such a small census of potential patients. In fact, LeadingAge cannot even provide an estimate on how many patients that CCRCs would project to serve if they were granted this exemption.

LeadingAge makes several misleading statements that its Petition and therefore I highly recommend you oppose their petition.

Thank you,
Maria

Sent from my iPhone