

Public Comments regarding Proposed Temporary Rules for Overnight Respite in Adult Day Services Setting - Pilot Program

We are very pleased that our customers (caregivers and participants) will be given the opportunity to utilize overnight respite in a non-institutional, familiar setting with familiar staff. The committee's decision to utilize the current Adult Day Services enrollment and documentation regulations to base the proposed temporary rules upon is a great way to streamline the process and reduce unnecessary waste.

The areas for which I have concern in the proposed temporary rules relate to space requirements.

- While the rules do not specifically state that the spaces mentioned need to be separate from the existing certified Adult Day program we have become aware that the intention is to have separate spaces. This is problematic from several standpoints. The cost of creating duplicate spaces (bathrooms, dining/living room, kitchen) is both an inefficient use of limited resources and prohibitive in terms of available capital dollars. In addition, one of the values of having an overnight respite program in an Adult Day setting is the social benefit a participant receives during the day. If a staff person is alone with a participant in a separate area, he/she is not able to offer the variety of stimulating experiences that the participant would gain in the group setting. All participants attending the Adult Day program during the day are given the opportunity to participate in structured activities, self-directed activities or observe quietly from a distance. Those participants enrolled in the overnight respite program would be given the same opportunities with the existing Adult Day setting.

- The second area of concern is the square footage requirement for bedroom size. When comparing this requirement to other small rooms that are currently used by participants in the Adult Day program, it is larger than we feel is necessary given that they will only be sleeping in the room. A suggestion would be to include the closet or wardrobe space in the suggested square footage.

- The third area of concern is the proposed size of the bedroom clothing storage area. Most of the clothes worn by our participants would/could be folded in drawers and almost all clothing worn by them can be laundered at the center.

Therefore, each participant would have minimal (4-6) items to hang and would not require 24 cubic feet of hanging space. Half of the suggested space for clothing storage would be sufficient. A great deal of empty space in the clothing storage area could cause some cognitively impaired participants anxiety by thinking that they are missing items.

We greatly appreciate the opportunity to provide comments on the proposed temporary rules and hope that you find them helpful when finalizing them.