



## QUALITY LONG TERM CARE

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August 16, 2024

Shanah Black  
Division of Health Service Regulation  
809 Ruggles Drive  
2701 Mail Service Center  
Raleigh, NC 27699-2701

Dear Division of Health Service Regulation,

On behalf of Friends of Residents in Long Term Care (FOR), a North Carolina nonprofit working for the interests of long-term care residents and their families, we write to express our support for the readoption of Subchapter 10A NCAC 13F, Licensing of Adult Care Homes of Seven or More Beds (<https://info.ncdhhs.gov/dhsr/rules/achfch2024.html>) as proposed by the North Carolina Department of Health and Human Services (NCDHHS) to strengthen emergency preparedness plan requirements for adult care home facilities.

We support many aspects of the proposed rules, including the emphasis on facility-specific and community-specific planning, and the requirements for comprehensive staff training and plan review during ownership changes to ensure staff know what to do and how best to protect residents during disasters. Natural disasters and emergency situations are inevitable in North Carolina, and when they occur and affect one of our adult care homes, the residents living in that home deserve to have an acceptable emergency preparedness plan in place and trained staff to help them get through the emergency.

As stated by NCDHHS: "A comprehensive, up-to-date emergency preparedness plan and appropriate staff training, as proposed in this rule, can help mitigate the impact of emergencies and disasters and can save lives."

FOR agrees with this and fully supports efforts to save these lives. We offer this letter as our formal statement of support for the adult care home (10A NACA 13F) Emergency Preparedness Plan rules as proposed for readoption.

Thank you for your consideration of our comments.

Sincerely,

Kay Paksoy Castillo, BSW  
Executive Director  
Friends of Residents in Long Term Care