

Comments re the Proposed Temporary Rules for Overnight Respite

The committee did an excellent job in creating the temporary rules as required by GS. 150B-21.1 (a1). Using the adult day care regulations and policies as a foundation makes it easier for prospective operators to prepare for this service that is an accessory to the day program.

There are a few issues about which I would like to make suggestions: I think the requirement in 10A NCAC 14D .0209 (d) for 160 square feet, excluding vestibule, closet or wardrobe space, in rooms occupied by two persons is excessive. I would respectfully request that the area for a bedroom for two persons be 160 square feet, *including* vestibule, closet or wardrobe space. In measuring our areas, the requirement seems unreasonable. Because they will be located in centers where activities are continuously provided, the bedrooms will only be used after all activities are concluded for the evening. I don't anticipate a participant doing much sitting in one's room, but rather going there just to sleep.

Second, in the same section, (h) the requirement that the bedroom closets or wardrobes shall be large enough to provide each resident with a minimum of 48 cubic feet of clothing storage of which at least one-half shall be for hanging clothes with an adjustable height hanging bar seems excessive. The participants, for the most part, will be staying a night or two and do not require that large an area for storage of clothes. In my opinion, a more appropriate size would be 22-23 cubic feet. Historically, our participants' coats and sweaters are housed in a hall closet. This will be a change that is not necessary and may be confusing to our participants whose coats will have to be moved from the hall closet to their room closet at some point during the late evening. Being able to keep traditional practices will provide continuity for our clients who will already having to cope with changes from their routine during day care. At Elderhaus, we will require overnight respite prospects to participate in the daytime program for at least a week before their overnight stay will take place. Changing anything will upset any participant who has dementia. Routine is the name of the game. I can imagine someone continuing to go to the hall closet to look for his or her coat.

Rules 10A NCAC 14D .0205 - .0207 imply that a separate area be available for participants who use overnight respite and that this area be available during the day

for these participants. It was my assumption that this service has been added to adult day care programs, as opposed to some other program, because the day programs provide socialization and the intermingling of services such as, adult day care, adult day health and, in my case, a PACE Program while, at the same time, providing these group of participants the opportunity to assimilate with their peers. I have found that all of the groups of participants are very tolerant of each other. It would do a disservice to the overnight respite clients if they were isolated from the other participants. Often, there will be just a single participant who has stayed overnight. The goal of every overnight visit is to have those participants assimilate into an adult day care program so there are no distinctions, either actual or perceived, by the overnight respite client. I doubt if any of the chosen pilots have space to provide two sets of all required space for participants.

Thank you for accepting these comments and I look forward to receiving your responses. I may be reached at (910)232-8310.

Linda A. Pearce

Thank you for the opportunity to comment and make suggestions on the temporary rules for overnight respite. Elderhaus is excited to have been selected to provide this unique service which supports caregivers who are coping with their responsibility of care. Thirty years of operating an adult day care center makes us uniquely qualified to easily broaden our scope of services to include overnight respite.