

October 31, 2011

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

This project is one that caregivers have been requesting for years. They appreciate the “home away from home” atmosphere provided by adult day care centers. The continuity of care provided by staff caregivers trust is a big proponent of the program. It offers a peace of mind to caregivers. As a provider I recognize the beauty of being able to provide overnight respite in adult day care is the participant will not only have overnight care but will be able to receive all the benefits of the day program.

The work put into making the proposed rules similar to the existing rules and regulations that govern adult day care centers is greatly appreciated. Respite is an extension of what we do every day and the requirements should be the same.

I do have a few concerns regarding “space” in the requirements. They are as follows:

1. 10A NCAC 14D .0205 through 10A NCAC 14D .0208 and 10A NCAC 14 D .0210 (Living Room, Dining Room, Kitchen and Bathrooms) the perception of the division’s interpretation of these rules is that the respite area should have each of these rooms designated specifically for the respite area in addition to the ones that already exist within the day program. This is contrary to the intent of the overnight respite bill. Again, the participant will be part of the day program. They will only need somewhere to sleep. If they chose not to participate in any part of the day program it will be treated just like any other participant choosing not to participate. The need will be met on an individual basis.
2. 10A NCAC 14D .0209 Bedrooms (H). This regulation requires that wardrobes or closets shall be a minimum of 48 cubic feet for clothing storage. This large amount of storage would be necessary if the participant lived at the center. Unlike residents who live in family care homes, overnight respite participants’ are enrolled on a temporary basis. With this in mind, I request that no more than 22 cubic feet be required. Also take into consideration the amount of space that the bedside tables provide.\*
3. 10A NCAC 14D .0209 (d). The minimum of 100 square feet per individual or 160 square feet per two (2) people **excluding**, vestibule, closet or wardrobe space is a large amount of required space for someone to sleep in. I request that the space **include**, vestibule, closet or wardrobe space.

Thank you in advance for your consideration in making these three (3) changes. The outcome of these changes will have a huge impact on the day programs’ ability to meet the stated requirements.

Again- many thanks for all of the hard work that has gone into making the standards caregiver, participant and provider friendly.

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