

Chris Vito's support for Item #8 Letter of Recommendation for Residential Facilities for Groups.

Good Morning, COA Members...

I read this email when I was out of town on my "Mom's Last Hoorah Cruise" before she loses more of her cognitive abilities from dementia diagnosed in 2011.

I feel very strongly and I am very supportive of this proposal for a few key reasons. I look at this from my experience preparing hospitals and other healthcare organizations for licensure and/or state surveys as an operator. I also cross-reference this experience as a small business owner and operator. However, I will disclose that I have no experience in residential facilities of 4 or less beds/residents or what I see as "Group Homes".

1. I believe moving facilities with 4 or less beds/residents from NRS Chapter 449 Residential Facilities to NRS Chapter 427A is a good idea because:
 - o A 4 or less beds/residents group home does not belong in the category of NRS Chapter 449 because it is too small and probably doesn't have the resources and/or the generated income to be regulated by 449.
 - o Most importantly, it is too small and I am guessing that half of the regulations of 449 are N/A (Not Applicable)
2. Having it under The ADSD (427A) is a great idea and probably more appropriate - again because it is small and needs the attention that 449 (I believe) may be brushed over because in their eyes it is a small/minor operation. Most importantly, from what I know about these 4 or less bed/resident Group Homes, it is fraught with neglect and abuse. I believe ADSD will do a better job regulating these operations. In addition, I believe ADSD will be able to identify and trend suspicion of abuse and neglect of their residents; probably because they oversee other HCBS agencies its residents attend.
3. Lastly, I am confident there are good-honest-caring group home businesses out there that don't cut corners and do their best to balance operations and profitability. More than not, it is extremely difficult to have their operations and its mandated state regulations generate a reasonable margin to continue operating. I believe ADSD will be able to create reasonable regulations for these small business owners, who may not be familiar with state regulatory agencies or even healthcare, to be able to be compliant.

I sincerely believe the State of NV needs alternative levels of care for its citizens as homelessness increases and unwilling small business owners take the Risk to be a provider. I strongly believe 4 or less resident/bed group homes have a place in our healthcare system. The State of NV and ADSD need to understand that these operators are not sophisticated business people or even realize they are committing Medicaid Fraud.

Therefore, I agree and support this COA Letter!