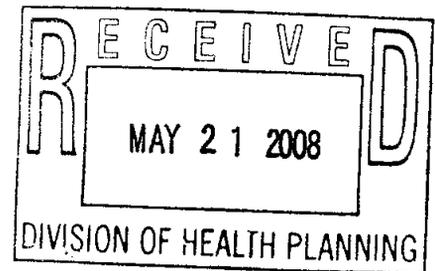


May 19, 2008



Clyde L. Reese, III
General Counsel
Department of Community Health
2 Peachtree Street
5th Floor
Atlanta, GA 30303

Re: SB433 – Reviewability of Personal Care Homes

Dear Mr. Reese:

It does not appear that Personal Care Homes (PCH) are specifically exempt from CON review as they are not listed among the exempt projects under section 31-6-47. However, under Section 31-6-2 paragraph (30) it appears the definition of PCHs has changed to contemplate facilities over 25 beds seeking Medicaid Certification. Could you clarify the impact of change in definition on the reviewability of a provider wishing to operate a PCH larger than 25 beds and not seeking Medicaid Certification?

As far as I am aware, Medicaid Certification is currently only available for homes under 25 beds. Since the definition of PCH's now includes Medicaid eligibility, would current CON approved providers be grandfathered for certification if and when Medicaid coverage is available for PCHs?

Does the expenditure of more than \$2.5 million to develop a PCH facility impact the reviewability of the project?

Please clarify the above referenced standards and please clearly outline the process by which a PCH would apply for an exemption, if applicable, in accordance to the State CON rules and health planning and licensure regulations. If you have any questions or require any additional information, please feel free to contact me by e-mail at kplatt@plathmc.com or by phone at 404-728-1974. Thank you for your guidance on this matter.

Sincerely,

A handwritten signature in cursive script that reads "Kathryn M.T. Platt".

Kathryn M.T. Platt
President