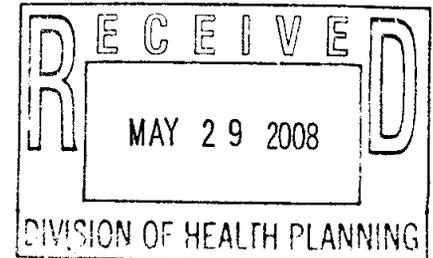


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May 27, 2008

Mr. Clyde Reese, Esq.  
Department of Community Health  
2 Peachtree Street  
Atlanta, Georgia 30303



Dear Mr. Reese:

As you know, the Georgia Association of Homes and Services for the Aging (GAHSA) is the nonprofit statewide association that represents over 150 key nonprofit and other mission-driven organizations dedicated to providing quality housing, health care, and community-based services that people need, when they need them, and in the places they call home. Our members serve over 126,800 older Georgians and offer the continuum of aging services in Georgia: adult day services, home & community-based services, senior retirement housing, assisted living communities, continuing care retirement communities, nursing homes and hospice care. These providers are committed to advancing the vision of healthy, affordable and ethical long-term care for older Georgians.

GAHSA's mission is to represent and promote the common interests of its members through leadership, advocacy, education and other services in order to enhance each member's ability to serve older adults. GAHSA is the only organization in Georgia to represent nonprofit providers of the full continuum of services to the senior citizens in the state.

In response to the invitation of the Department of Community Health (DCH), GAHSA has compiled a list of questions regarding the new certificate of need (CON) provisions contained in SB 433 relating to Continuing Care Retirement Communities (CCRCs):

1. Will there be a specific form for a CCRC to submit in order to obtain a "written exemption" in order to admit the allowable number of residents from the community into a skilled nursing facility?
2. Is July 1, 2008, the first date a CCRC could apply for an exemption? If so, are there data, documentation, etc. that the CCRC can be preparing prior to July 1, to support the request for an exemption? If so, what?
3. If DCH anticipates drafting rules on the CCRC "exemption", when can that process be expected to begin? Must a CCRC await the rules process prior to seeking an exemption?

4. Can existing CCRCs assume that the percentage of skilled nursing beds allowed will be determined by whatever year they are in their operations?

5. Similarly, can an existing CCRC that is applying for new beds assume that the percentage of new beds which can be used for direct admissions would be determined by the year of operation it is in?

Please feel free to contact Tom Bauer ([TBauer23@aol.com](mailto:TBauer23@aol.com)) or me ([wcoffey@gahsa.org](mailto:wcoffey@gahsa.org)) if you have questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads "Walter Coffey".

Walter Coffey, President  
Georgia Association of Homes & Services for the Aging