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Brad Little
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January 21, 2020

Senator Martin, Chairman
Senate Health and Welfare Committee
Statehouse
Boise, ID 83720

RE: Docket No. 16-0322-1901 Rules Governing Residential Assisted Living Facilities

Dear Chairman Martin and Members of the Committee:

The Council on Developmental Disabilities is authorized by federal and state law to monitor systems and policies and to advocate for improved and enhanced services that enable Idahoans with developmental disabilities to live meaningful lives, included in their schools and communities. The Council is comprised of 23 volunteers appointed by the Governor.

The DD Council supports the proposed rules Docket No. 16-0322-1901 *Rules Governing Residential Assisted Living Facilities*. The Council sits on the Community Care Advisory Council which advises the Division of Licensing and Certification on Residential Assisted Living Facilities and Certified Family Homes, these rules were presented to the advisory committee twice in the past year for its review, input and recommendations. These rules have been well-vetted.

The following sections highlight the extensive precautions put into place for resident safety:

- 1) Section 9, *Criminal History and Background Check Requirements* clearly outlines staff to resident contact while there is a waiting period for a facility to receive the results a criminal history background check of a newly hired staff. Also, the addition of language requiring direct line of sight supervision for all staff until the criminal history check is completed and the facility is in possession of is recognized as a positive step in protecting vulnerable individuals.
- 2) Section 153, *Financial Requirements*, these protections are a welcome addition to this set of rules and clearly outlines the safeguarding of residents and the requirement of distinct resident accounts separate from that of the facility.
- 3) Section 155, *Emergency Preparedness*, this additional section requires each facility to have an emergency preparedness plan to follow in the event of fire, flood, earthquake, high wind or any other emergency. In addition to this the DD Council is pleased to see the requirement of written agreements between the facility and at least two separate locations to which residents may be relocated in case of emergency.

Thank you to the Division of Licensing and Certification for the significant work they have done on these rules and thank you for your time and consideration of the Council's comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Richelle Tierney". The signature is fluid and cursive, with a large initial "R" and a long, sweeping tail.

Richelle Tierney
Idaho Council on Developmental Disabilities