# Assisted Living Residences (ALR) Commission

Meeting Minutes

Tuesday, July 15, 2025

11:00 am - 12:30 pm

Date of meeting: Tuesday, July 15, 2025

Start time: 11:00 am

End time: 12:30 pm

Location: Virtual Meeting (Zoom)

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| **Votes** | **Members** | **Present** | **Vote 1:****Approval of 5/7****Meeting Minutes** | **Vote II:****Approval of****6/4****Meeting Minutes** | **Vote III:****Motion to Adjourn** |
| **1** | **Secretary Robin Lipson** – Secretary, Executive Office of Aging & Independence (AGE) *(Chair)* | X | X | X | X |
| **2** | **Dr. Jessica Zeidman** – Deputy Commissioner/Chief Medical Officer, Department of Public Health | X | X | X | X |
| **3** | **Pavel Terpelets** – Director of Institutional Programs, Office of Long-Term Services and Supports (OLTSS), MassHealth | - | - | - |  - |
| **4** | **Carolyn Fenn** – State Ombudsman and Director of the Long-Term Care Ombudsman Program, EOHHS | X | X | X | X |
| **5** | **Representative Thomas Stanley** – State Legislator, Mass. House of Representatives  | X | X | X | X |
| **6** | **Senator Patricia Jehlen** – State Legislator, Mass. Senate | X | X | X | X |
| **7** | **Senator Mark Montigny** – State Legislator, Mass. Senate | X | X | X | - |
| **8** | **Matt Salmon** – CEO, Salmon Health and Retirement | X | X | X | X |
| **9** | **Tara Gregorio** – President, Massachusetts Senior Care Association (MSCA) | X | X | X | X |
| **10** | **Mathew Muratore** – Appointee of the House Minority Leader | X | X | X | X |
| **11** | **Beth Anderson**– An Appointee of the Governor, Vice President at EPOCH Senior Living | X | X | X | X |
| **12** | **Kathleen Lynch Moncata** – An Appointee of the Governor, Attorney | X | X | X | X |
| **13** | **Rose-Marie Cervone**– An Appointee of the Governor | X | X | X | X |
| **14** | **Liane Zeitz** – Owner, Law Office of Liane Zeitz, the representative of the Massachusetts chapter of the National Academy of Elder Law Attorneys | X | X | A | X |
| **15** | **Elissa Sherman,** President of LeadingAge Massachusetts, Inc. | X | X | X | X |
| **16** | **Brian Doherty,** President & CEO of Massachusetts Assisted Living Association, Inc. (Mass-ALA) | X | X | X | X |
| **17** | **Jennifer Benson** – State Director of AARP Massachusetts | - | - | - | - |
| **18** | **Katherine Ladetto** – Assistant Professor, School of Nursing, Simmons University, the representative of the New England chapter of the Gerontological Advanced Practice Nurses Association | - | - | - | - |
| **19** | **Lainey Titus Samant** – Senior Advocacy Manager, Alzheimer’s Association, MA/NH Chapter | X | X | A | X |
| **20** | **Dr. Jennifer Maynard** –Executive Director, Massachusetts Program of All-Inclusive Care for the Elderly (Mass. PACE) | X | X | X | - |
| **21** | **Lindsay Mitnik** –Staff Attorney, Elder Law- Greater Boston Legal Services | X | X | X | X |

**\*** (X) Voted in favor; (O) Opposed; (A) Abstained from vote; (-) Absent from meeting or during vote

**Proceedings**

The Secretary of the Executive Office of Aging & Independence (AGE), Robin Lipson, called the meeting to order. She noted that the meeting was conducted pursuant to the Open Meeting Law. She started by acknowledging the devastating fire that occurred yesterday at Gabriel House. 9 Residents of Gabriel House lost their lives. They were people who lived in a community, who were loved by family and friends, and who were cared for by staff. All the people whose lives they touched are grieving, as are many in the community. To say that this tragedy is heartbreaking doesn’t begin to capture how people are feeling. Secretary Lipson wants to personally express her deepest condolences to the families of those who died, as well as to the Residents and staff who were involved and survived. She also wants to thank first responders and local officials who acted with courage under unimaginable circumstances.

Secretary Lipson also wants everyone on the Commission to know that the Governor herself is personally involved in all matters related to this and actively supporting all the teams involved. The Governor is ready to continue to support the Residents, as is the rest of her team. Secretary Lipson mentioned that someone on the Long-term Care Ombudsman team woke up, heard the news, drove directly to Fall River, and was there at the beginning of the day. This person was able to speak with the Residents who were evacuated and was able to speak with their families. They have worked collaboratively to help place the Residents in temporary residences and are now working with the rest of the Ombudsmen in the region to follow up with the Residents regarding where they are staying.

Secretary Lipson thanked those who reached out to offer support. She wanted to thank Elissa Sherman from Leading Age, Brian Doherty from Mass-ALA, and Tara Gregorio from Massachusetts Senior Care Association for their tremendous and swift response that their members provided. We were able to find temporary placements for every single person who needed them--that is the way the system is supposed to work. Secretary Lipson is grateful to all of you for your help with that. As of last night, the Residents who were not hospitalized all had temporary housing. We are working closely with the Governor’s team, the Legislature, the local Aging Service Access Point (ASAP), which is Bristol Aging and Wellness, and local leaders to continue to ensure that Residents have a roof over their heads and everything they need. The Residents’ records about their medications and things that they need to be safe were all saved—and those have been transferred with Residents so that they are not missing anything in their medical regimens. As you know, investigations are ongoing. Secretary Lipson noted that she does not think we have answers at the moment.

Secretary Lipson believes it is best to wait until the investigation is complete. We want to learn from the right answers—not fast, inaccurate, or incomplete information. We need some time to get that information and to process that information before acting.

While it is difficult to pivot from the tragedy, Secretary Lipson wants us all to continue to think about what happened yesterday as we carry the Commission’s work forward. Moments like this underscore why this Commission’s work is so important. We are here to examine how the Assisted Living model is evolving, how it must continue to evolve to best serve the needs and protect the needs of the people who live in these Residences. Thank you for being here. Thank you for your commitment to this work. And thank you for letting me take a few minutes just to recognize how yesterday has changed many lives and how perhaps it will change our thinking.

Secretary Lipson does want to talk about how we proceed, the timing of the report, and so forth. Let’s save that for the next agenda item.

Senator Mark Montigny noted that as is typical of the American political system, we tend to scramble and get to regulations and law after tragedy. The only good news is what should have been done years ago, gets done as a reaction to the tragedy.

Senator Montigny won’t jump to conclusions either, but he trusts the workers more than he trusts the owners and investors. He suggested that before we produce any final report, we look at significant data and information from an initial investigation. He does not mean that we wait for these investigations that take forever—we can draw conclusions.

In assisted living situations, Senator Montigny’s conclusion perhaps prematurely and inappropriately was, people are making choices, they have the private funds to pay—that isn’t always the case. He is not sure exactly what the cost of this facility is. The lobbying over the years that he has faced in opposition to anything to regulate assisted living or further regulate nursing homes has been the same insidious coziness that goes on in Washington, on Beacon Hill, and across the country. So what he wants to make sure that we do is, yes we should reserve our final conclusions until an investigation is complete, but we also should not close the book on a report of this Commission. If need be, he will offer legislation to extend the deadline. He wrote the legislation. If you want to build something, or manage something that actually has vulnerable people, he thinks we need to be far more stringent with regulations in this industry. He thought that long before this fire.

Liane Zeitz wanted to echo what Senator Montigny said. She agrees wholeheartedly with him. She is concerned about how much time we need to draft the report and make sure that the report is comprehensive.

Matt Salmon wanted to say two things. The first thing was that that we as a group need to find the root cause of what went on there. In 2017, he had the unfortunate experience of having a light fixture short out in one of the bathrooms--75 plus Residents were evacuated. And second, let’s understand the cause—there’s a lot of things that he has seen and read that don’t make a lot of sense to him having been through that experience.

Senator Patricia Jehlen also thinks that we should extend this Commission. We have to recognize what happened and take something--either extending this Commission or establishing a new task force, which would not require any legislation. The task force could consider the investigation. We could think about the make up of the task force. Obviously, we cannot leave this conversation where it is.

Secretary Lipson noted that we all need a little bit of time to absorb and reflect on how what happened yesterday influences how we approach this work. She would not expect for people to be able to react today and come up with the most thoughtful or impactful recommendations.

Senator Montigny agrees with Secretary Lipson. Secretary Lipson recognizes that we will at least need a little more time to process this and to be thoughtful about it. Secretary Lipson mentioned that this group has done a tremendous amount of work over the last several months. These reports are always hard to write. It is always challenging to build consensus and to find consensus—but she thinks we can. Together, we learned so much. As she looked at the responses that were sent in over the last few weeks, there are some very common themes. We did try to capture those in the document that was sent late last week. She does want to note that that the document is not a final report—sometimes you have to write a draft so people can start to think about it. It is meant as much to provoke conversation and editing and clarification as it is for any other purpose. We sent it in the spirit of getting us to a point where we can have concrete conversations about recommendations—we are not trying to shove this down people’s throats and make them sign off on it. We most definitely need to take some more time in light of yesterday’s tragedy.

Representative Thomas Stanley mentioned that he feels terrible about what happened and for the families and the people who lost their lives and everyone who was living there or who worked there. He feels strongly about two things—one is we need to do a deep drive based on the explanation and results. He also notes that this Commission has been working and that there is another meeting before the August 1st deadline--if there is broad consensus on a whole host of things, he doesn’t see why we can’t approve that with the caveat of really starting something new with regard to what happened two days ago and do a deep dive on it. These facilities are different in a lot of ways and he thinks that there are a lot of improvements that the government can make that may help prevent something like this from happening again. We do not know for sure about anything until the investigation is done.

Secretary Lipson noted that a Commission report is not the end of a conversation. In this case, it is the beginning of a conversation. We may decide that we want to capture some of what we know we need to capture and get that out there—and then take a little more time looking at other areas—such as putting some focused effort into understanding the options for the more affordable assisted living model—what that looks like, whether it should be regulated or supported in a different way. That could be work that we continue perhaps with some people in this group, or perhaps with some other experts to really develop a better sense of what that should look like and make some recommendations.

The thing about these affordable places is that there are not very many of them, it’s challenging to finance them, the rents are deeply discounted, and so there is not cash coming in to make renovations to the buildings. If Residents need additional services, those are largely provided through a MassHealth program, and so one the things we should think about is—does that model work? Do we need a stronger conductor or some entity to pull all of that together. Secretary Lipson does not know the answers, but she could see a group of smart people diving into that and coming up with some good recommendations. We may not want to hold up the rest of the charge that we will be close to completing over the next month in order to do that.

Liane Zeitz mentioned that the Executive Office of Aging & Independence (AGE) has done a great job in moving this Commission along in a systematic, thoughtful, and timely way. She also applauds the efforts of those who helped out yesterday. The fire highlights the difference in terms of the quality of different Assisted Living Residences—just as exists with nursing homes. People in the industry, who are members of the Commission, she believes, see the better Residences, and the advocates are more familiar with the Residences do not have the same standards. This highlights the need for more regulation, which many members who are on this Commission who are industry representatives may not see because they do not see the problems that advocates do. She feels strongly that this is an opportunity to do a report that the Legislature is going to see and that should be comprehensive. The Commission has missed a lot of opportunities to receive input and have a thorough discussion. She knows that people have submitted written testimony after the public hearing—but there was no discussion of the testimony that was submitted. She has no idea whether Commission members have actually read and considered that testimony. In terms of the survey that was the basis of the draft report, less than half of the Commission members actually participated. She believes there is a need to not rush the report and to have a much better report.

Ms. Zeitz noted that she put five comments in the chat.[[1]](#footnote-1) She thinks there are many important issues that have not been addressed. She is concerned that given the political climate there is going to be even more problems in terms of the quality of care that is given. There have been many thoughts and comments, but Jim LoMastro, who is on this call and is a member of Dignity Alliance, has a lot of experience and a lot of thoughtful comments. He submitted written testimony. She would like for him to have an opportunity possibly at a later date to present his viewpoint to the Commission members and to engage in discussion. Ms. Zeitz noted that the draft report shows a lot of work. She does not want to be critical of the process, she just thinks it’s important for us to take our time.

Whitney Moyer, the Chief Operating Officer of the Executive Office of Aging & Independence, mentioned that the testimony that was provided during the May 15th public hearing was provided to Commission members without any alterations. Commission members were also provided a summary document, which was considered as part of the findings and recommendations that we put into the report. In the report itself, we noted the number of testimonies received. For the report, we also considered the additional feedback from Commission members around recommendations or key areas that they feel are important or might be working well. Three key areas as a basis for a beginning point for the findings and recommendations are: (1) discussions we have had here throughout the various meetings; (2) the May 15th public hearing testimony that we received; and (3) the survey that was shared with Commission members. Further discussion we know is needed here.

Senator Montigny mentioned that his criticism generally of commissions is not a criticism of this Commission at all—after observing these meetings and the work that has been done, he would suggest that most Commissions would learn a lot from this Commission. Some ALRs that appear affordable he compares a lot to sober houses, where they use law and regulation or lack thereof to essentially create a boarding home. His default is that he feels that August 1st is rushed. He doesn’t mean that the Commission should wait forever—he’s open to suggestions.

Mathew Muratore stated that he believes it is important that the work the Commission has done gets submitted by August 1st. In light of the tragedy, he believes that more work does need to be done. However, this doesn’t mean that the Legislature cannot accept this report. The Commission could come up a task force to look specifically at what happened at Fall River. He is in favor of getting this report to the Legislature.

Senator Montigny noted that this proposal would require a vote. Secretary Lipson stated that she thinks there is a path forward that will satisfy most Commission members.

Kathleen Lynch Moncata noted that as a consumer representative on the Commission, we have the attention right now on ALRs as an industry, and from a consumer’s perspective, she is concerned that we do not do things piecemeal—that we look at the overall picture. Safety is an overriding concern for all Residents. Her hope is the individuals who lost their lives will not have died in vain, and we will come out with meaningful recommendations, but in a holistic manner, not piecemeal.

Secretary Lipson moved to the matter of approving minutes and taking roll call. There are draft minutes from the May 7th meeting and the June 4th meeting that need to be approved. No proposed changes were made to the May 7th draft meeting minutes. A motion was made and seconded to approve the May 7th meeting minutes. The May 7th meeting minutes were approved by a roll call vote. *See* Vote I in Chart above.

No changes were proposed to the June 4th draft meeting minutes. A motion was made and seconded to approve the June 4th meeting minutes. The June 4th meeting minutes were approved by roll call vote. *See* Vote II in Chart above.

Whitney Moyer spoke about the [Draft ALR Commission Report](https://www.mass.gov/doc/alr-commission-draft-report/download). The first few slides give an overview of the Commission and the ten charges of the Commission. She noted that the key findings and recommendations are located in the beginning of the draft report. The third section focuses on the public hearing testimony and findings. The fourth section is the majority of the report in terms of length. We take all ten charges and provide the key findings and discussion points that we had as a Commission.

Today we will focus on the key findings and recommendations. Slide 8 notes the 5 key findings. Slides 9-13 elaborate more on the 5 key findings. The 5 key findings are:

1. ALRs remain unaffordable for many individuals.
2. A Resident or a Resident's family may not be aware or fully understand the cost increase as the Resident's support and service needs increase. Also, it may be unclear when a Resident needs to move out of an ALR because of their evolving needs.
3. Disclosure statements are crucial in helping residents understand what services an ALR can provide to them.
4. Individuals have difficulty accessing information on ALRs, such as compliance review reports of ALRs and incident reports.
5. Staffing and services vary across ALRs but overall, the residential model under which ALRs operate is often preferred over institutional settings and helps reduce loneliness and social isolation.

Ms. Moyer noted the 4 corresponding recommendations that went along with Finding # 1. *See* Slide 9. Liane Zeitz stated that she agrees with everything that is written here—the issue she has is that it does not address the problem. The current system as it exists in terms of what Medicaid, PACE, SCO, GAFC, etc. will cover is not sufficient to cover the cost of care for lots of people. She would recommend that the Commission use some meeting time to discuss the pros and cons of the Frail Elder Waiver to cover ALR services.

Senator Patricia Jehlen is saying the same thing—she doesn’t think they will likely get a waiver in the near future, but she does want to find out if there is any value in getting that process.

Lindsay Mitnik noted she supports what Ms. Zeitz said. She added that an important part of affordability concerns junk fees. She also noted that in April the Commission had a conversation about junk fees. She would like to see getting rid of junk fees or having more regulations around what fees are allowed and transparency about them up front mentioned in this first finding of the draft report.

Representative Thomas Stanley noted that not every Residence is a member of a group such as Leading Age Massachusetts or Massachusetts Assisted Living Association (Mass-ALA). Those groups provide a lot of information and education of the state programs that can be utilized. Representative Stanley believes that Gabriel House was not a member of these groups.

Ms. Moyer discussed the second finding and corresponding recommendations. *See* Slide 10. Dr. Jessica Zeidman had a question around process and message. In Slide 10, the draft report states “consider uniform intake and reevaluation assessments.” She wonders how we think about the word “consider” versus “recommend.” She wants the Commission to consider the strength of the message and the language here around standardization.

Rose-Marie Cervone stated that right now the only regulation regarding staffing in an ALR is that there’s one college-educated person who is employed full-time by each ALR. She thinks that when we talk about defining nursing scope of practice, we should also perhaps require that each ALR have one nurse available 40 hours per week. She thinks that the nurse should be an RN, not an LPN because an LPN cannot write care plans. One full-time nurse per ALR depending on the size she does not think is overly burdensome.

Matt Salmon commented that we should have some consideration there for uniform standards and allow the Residences themselves to create the assessments and forms to meet those standards. Not every ALR operates the same way—you can have ALRs that do not have dementia programming, you can have ALRs that only have dementia programming. He thinks unform assessments can create problems for the operators.

Liane Zeitz, in response to Matt, does think there can be a uniform assessment with different sections. The assessment can be divided based on what level of care and what services are provided. She also wants to focus on the title of Finding # 2 Recommendations, which currently states “Clarify Criteria and Costs as Needs Change.” *See* Slide 10. She believes that the title should note that criteria needs to be clarified *upon admission* and as well as when needs change. One of the problems she has seen is that ALRs promise a lot of care and make promises about what they will be able to provide and at what price. Then it turns out that that the care is not provided or it costs more. She thinks it’s important to have a uniform form that is created by the Executive Office of Aging & Independence and that all ALRs use this uniform form.

Ms. Moyer then discussed Finding # 3 and the corresponding recommendations. *See* Slide 11. Finding # 3 states that “the ALR Commission found that disclosure statements are crucial in helping residents understand what services an ALR can provide to them.” Matt Salmon noted he would use the same logic that he discussed with the last slide. He thinks that when you limit the communication that an ALR has with a potential Resident to the exact same formatting that each ALR is using, the potential Resident does not have an opportunity to see how these individual locations or communities are approaching their care and their philosophy.

Ms. Moyer mentioned that the uniform disclosure statement is not meant to limit ALRs from providing their specific materials to prospective Residents. Mr. Salmon mentioned as an operator that you run a risk of a surveyor saying that’s not the same form. If an ALR added color to a uniform disclosure statement, someone’s interpretation of what a uniform disclosure statement is upon survey could be different from building to building.

Rose-Marie Cervone stated that having a uniform disclosure form doesn’t prevent an ALR from presenting marketing materials. Ms. Cervone noted that as a consumer, when she visited ALRs, she was looking for the philosophy of the ALRs—this would not be in a uniform disclosure form.

Mr. Salmon noted that it is the unform piece that makes him nervous—he does not have a problem with disclosure statements.

Lainey Titus Samant thinks the idea of having a common form for all ALRs in the state is important. Being able to compare apples to apples is important to families.

Ms. Moyer noted that the Commission will flag this recommendation and come back to it to see if we can reach a consensus for it. The Commission may need to indicate where there are differing opinions. Ms. Moyer then discussed Finding # 4, which states “[t]he ALR Commission found that many individuals have issues accessing public information on ALRs, such as compliance review reports and incident reports. The public needs to make a public records request to receive this information. Some may find making a public records request to be burdensome, confusing, and time consuming.” *See* Slide 12.

Ms. Moyer also mentioned the corresponding recommendations, which were:

1. AGE is working on making information more accessible to the public, including compliance review reports, responses, and notices of final action. AGE will be posting these documents on its website.
2. Leverage AGE’s enhanced oversight authority to establish appropriate fines to ensure resident safety.

Liane Zeitz asked that there be information on the number of substantiated complaints made. She also asked if additional funding is needed for AGE to be able to make information more publicly available.

Ms. Moyer discussed Finding # 5, which states: “Staffing and services vary across ALRs but overall, the residential model under which ALRs operate is often preferred over institutional settings and helps reduce loneliness and social isolation.” *See* Slide 13. The corresponding recommendations were:

1. Support flexibility in staffing ratios to reflect the specific acuity and care needs of each community rather than applying a one-size-fits-all approach, but study best practices in staffing models for future consideration.
2. The promotion of resident and family councils that are independently run (not ALR-managed) to improve accountability and resident advocacy.
3. The balancing of medical and social models, which includes recognizing the growing acuity in ALRs while preserving their unique community environment.

Rose-Marie Cervone thought that this goes along with Finding # 2 because in Finding # 2 we’re talking about uniform disclosure and staffing—and then in Finding #5 we talk about socialization and staffing. Perhaps Finding # 5 should be Finding # 2a or Finding # 3.

Carolyn Fenn, State Ombudsman and Director of the Long-Term Care Ombudsman Program, asked how the ALR certification unit determines what is appropriate for staffing ratios—what tools are being used to assess that? Is it a gut feeling or some validated methodology? Ms. Moyer noted that this is something for the Commission to look at.

Beth Anderson noted that upon recertification, when an ALR fills out an application, her organization provides a Resident list and an employee list. When a surveyor goes to the ALR to conduct the survey, they ask for updated copies of both of those documents. Those lists include what specific services a Resident may be receiving. In her organization’s Residency Agreement, they include the number of team members by their position and shift.

Senator Jehlen said perhaps the Commission should consider designating who would study best practices and balancing the medical and social models.

Liane Zeitz thinks that there needs to be more meetings and the timeline of the report needs to be extended. She also thinks the Commission needs to discuss the qualifications for ALR administrators and managers. She thinks the Commission should look at having a license requirement for administrators—there would need to be a board of registration, as there is for nursing home administrators. The qualifications for the managers on duty should be higher than they currently are. There needs to be some consideration of safety issues and whether that is left to local authorities or does AGE need to have some greater role in monitoring safety issues, such as what kind of drills are done and making sure fire drills performed. There are currently two levels of certification—she questions whether there should be more than two levels of certification, and whether staffing levels should vary by level of acuity. She also brought up the need for additional funding for certification and complaint staff, and also for the ombudsman program.

Secretary Lipson asked to observe a moment of silence to acknowledge the lives that were lost and the lives that were put on the line in the past 48 hours. The moment of silence was observed. Secretary Lipson thanked Jenn Maynard for the suggestion to have a moment of silence.

Secretary Lipson mentioned that the Commission has another meeting next Wednesday. The Commission will continue this discussion. The AGE team will incorporate the feedback that we got this morning on the draft report. The Commission can circle back and confirm that we need an extension for the report to the Legislature.

Representative Carole Fiola noted that she has just learned about this Commission and wanted to join the meeting in light of everything that has happened. She thinks there will be a number of issues will probably need to be addressed through this report and beyond.

A motion to adjourn was made and seconded. A roll call vote was taken. See Vote III in Chart above. The meeting was adjourned at 12:32 P.M.

**Meeting Materials:**

1. [Draft ALR Commission Report](https://www.mass.gov/doc/alr-commission-draft-report/download)
1. Ms. Zeitz’s comments were:

1. The commission should not be rushing to have these discussions and draft its report in the middle of the summer when many people may be on vacation.

2. It appears that less than 50% of Commission members responded to the survey.

3. I had no idea that the survey was to be used as a basis for a draft report. I thought it would be a basis for additional discussion.

4. Clearly the incredibly tragic fire in Fall River highlights the need for further discussion about regulatory oversight. It also highlights the issue that consumers advocates see the issues in residences that aren’t necessarily as well run as other residences and that are not necessarily representative of the residences that the Commission has heard from.

1. Main issues that I think warrant further consideration:

a. Affordability, options for increased MassHealth or other subsidized coverage of ALRs

b. Minimum staffing levels

c. Qualifications of ALR administrators and managers

 i. Higher standards of eligibility

 ii. Require licensing for ALR administrators

d. Safety Oversight and monitoring (in light of the Fall River fire)

e. Consideration of more than 2 “levels” of certification (memory units and other) with different requirements for staffing (including RN and MD staffing) and other requirements.

f. Need for additional funding for AGE certification and complaint staff and additional staff as needed to increase availability of public information on website and elsewhere.

Final: Consideration of more than 2 “levels“ of certification (memory units and other) with different requirements for staffing (including RN and MD staffing) and other requirements. [↑](#footnote-ref-1)