

My name is Kristen Gilley, and I am writing to express my strong opposition to the proposed changes to the current regulations governing assisted living facilities in the State of Maine.

As both a current staff member at Woodlands Senior Living and a family member of a former resident, I have witnessed firsthand the profound impact this industry has on Maine families. At Woodlands, we provide assisted living and specialized memory care to more than 700 residents statewide. The services we offer go beyond basic care—they represent compassion, dignity, and a true commitment to the well-being of our aging population.

When members of this committee visited our communities, you experienced a glimpse of the vibrant, supportive environments we strive to create every day. Assisted living is not institutional care, and yet the proposed regulations seem to adopt a one-size-fits-all model more appropriate for nursing homes. Our residents thrive precisely because we offer a *social model of care*—personalized assistance with daily living, medication administration, home-style meals, and meaningful therapeutic programming that honors each individual's unique needs and preferences.

One of the most concerning elements of the proposed rules is the mandate to add additional staff to meet the minimal staffing ratios across all three shifts. Simply increasing the number of people in the building does not guarantee better care. What percentage of substantiated complaints were truly due to staffing shortages alone? Rather than focusing mostly on headcounts, why aren't we instead looking at quality outcomes? There's a critical difference between having "a body in the room" and having policies and procedures guiding the work of a *trained, compassionate caregiver* who understands the residents they support.

The proposed staffing requirements would impose a 10% cost increase for us at Woodlands Senior Living—a cost of over \$3,000,000, requiring us to hire an additional 50 full time equivalent staff members. This unfunded mandate is unsustainable in today's strained labor market. With Maine already facing historic staffing shortages, such regulations would strain our resources to a breaking point, making it harder—not easier—to provide quality care. Who foots the bill for the additional \$3,000,000?

So where do we go from here?

We should move forward *together*. These proposed changes will drastically change the landscape of the assisted living industry in Maine. The consequences won't be theoretical—they'll be immediate and real. Are we truly prepared for the closure of assisted living facilities across the state? If those doors shut, where will these seniors go? Who will care for them? And at what cost—both financially and humanly?

This is not a time for blanket mandates. It's a time for partnership.

I urge the Department of Health and Human Services and this committee to pause, listen, and engage in meaningful collaboration with the people who know this work best—Maine's assisted living providers. As the oldest state in the nation, Maine should be a national leader in elder care—setting the standard with thoughtful, proven and compassionate policy that reflects the real

needs of our communities, not one-size-fits-all regulations that jeopardize the very care our seniors rely on.

Please consider not just the fiscal implications, but the human ones. These decisions affect real lives—our parents, grandparents, friends, and neighbors.

Thank you for your time, attention, and dedication to Maine's elder care system.

**Sincerely,**

A handwritten signature in blue ink that reads "Kristen Gilley". The signature is written in a cursive, flowing style.

Kristen Gilley  
Waterville, Maine  
Director of Executive Operations & Marketing  
Woodlands Senior Living