

Catherine Thibedeau
Orono

Written Testimony neither for nor against LD 578 Resolve, Regarding Legislative Review of Portions of Chapter 113: Regulations Governing the Licensing and Functioning of Assisted Housing Programs: Infection Prevention and Control, a Major Substantive Rule of the Department of Health and Human Services, Division of Licensing and Certification

My name is Catherine Thibedeau, and I am the Executive Director of Independence Advocates of Maine. We are a provider agency supporting people with intellectual and developmental disabilities within Penobscot County.

While I am supportive of these regulations to improve the infection control practices in Assisted Housing Programs, I have a couple of concerns with language and specifics. Before I get into that, I think it is essential to understand that Assisted Housing encompasses a wide variety of congregate living settings ranging from 1-2 person group homes for individuals with IDD to large assisted living homes for the elderly.

A.5.iii. states that facilities must provide transmission-based precautions to all staff at the time of hire. While I support the inclusion of standard precautions training and the other elements of the requirements, the inclusion of the transmission-based precautions seems excessive for all levels of assisted housing, especially 1-2 person licensed homes. The reality that this training is applicable outside of the immediate global pandemic is minuscule. I would suggest that this level of training be required in outbreak situations.

A.5.d. includes the requirement that the facility must maintain a copy of the IPC training curriculum utilized to provide education to staff. It does not specify how long such a curriculum needs to be retained. I would suggest that this expectation be included.

A.4. includes the words “facility must implement any recommendations of the MeCDC.” The words “must implement any recommendations” appear to conflict with each other. Does this refer to MeCDC guidance issued, and will there no longer be room for interpretation and application in assisted housing programs? The inclusion of additional clarity on the expectations around this language would be suggested.

I would be remiss not to include acknowledging that this is yet one more unfunded mandated being placed on providers. The on-going costs of additional training, staff or contractual hours to oversee and implement the plan, and implementation and maintenance of respiratory protection plan on nare inconsequential and,

Thank you for your time.

Respectfully Submitted by Catherine Thibedeau