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May 18, 2010

Jack R. Drago
Chief, Service Census Branch
U.S. Department of Commerce
Economics and Statistics Administration
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Dear Mr. Drago:

The American Health Care Association (AHCA) and the National Center for Assisted Living (NCAL) appreciate the opportunity to provide comments to the U.S. Census Bureau on the *2007 Economic Census: Nursing and Residential Care Facilities* (HC-62301). AHCA and NCAL represent more than 10,000 non-profit and for-profit providers dedicated to continuous improvement in the delivery of professional and compassionate care for our nation's frail, elderly and disabled citizens who live in long term care facilities, including nursing facilities, assisted living residences and homes for individuals with developmental disabilities.

AHCA/NCAL have both general and specific comments to the 2007 document, which we will describe below; but we also would appreciate the opportunity to meet with you/your staff to have more of a dialogue and better explain our questions/concerns:

General Comments:

- Over the years, AHCA/NCAL has worked extensively with the U.S. Census Bureau to ensure that the decennial Census process occurred quickly and efficiently within long term care settings; however, to date, we have heard very little about the economic Census. Subsequently, it would be prudent to provide more information than just one line on the HC-62301 describing the purpose of the economic census; what the information gleaned is used for; how the decennial Census compares to the economic Census, etc.

Specific Comments:

- The title throughout the document is not clear – we suggest that you revise it to read *2007 Economic Census: Nursing, Assisted Living and Residential Care Facilities*. The terms “assisted living” and “residential care facilities” are not always interchangeable.

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- Bruce Yarwood**
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- Under *Physical Location*, page 2 – There are numerous multi-facility corporations within the long term care profession. Would it be possible for these corporations to provide information for each of their facilities in one document or form?
- Under *Sales, Shipments, Receipts, or Revenue*, page 3 – Change the title to read *Revenue or Receipts*. Long term care providers typically use the terms “sales” and “shipments” only to respect to vendor relationships.
- Under *Kind of Business or Activity*, page 4 – Some of our long term care providers will have difficulty discerning which one box is appropriate for them to check. For example, one provider may have a nursing facility and an assisted living facility at one location. Further, we question whether the code numbers listed alongside the business or activity descriptions correspond to specific and unchangeable federal categories. If not, several of the descriptions listed are incorrect and should be updated:
 - Box 2 (623 210 002) should read *Developmentally Disabled facility, including group homes and intermediate care facilities providing residential care for the cognitively impaired*;
 - Box 4 (623 110 00 1) should read *Nursing care facilities providing nursing or rehabilitative services*. Currently, there are a few nursing facilities that do not provide rehabilitative services;
 - Box 6 (623 312 00 3) should read *Home for the elderly, including independent living or assisted living facility*. Assisted living facilities may or may not have nursing care on site.
- Under #20 and #21, page 5; and #23-29, page 7; it is unclear why there is a box that is labeled *Not Applicable*.
- Under *Detail of Sales, Shipments, Receipts or Revenue*, pages 5-8 – The title should be changed to correspond with the new title on page 3 – *Revenue or Receipts*. The instructions on page 5, for Line 1-21, include terms, references to services and descriptions that would be confusing to long term care providers. We would need clarification from you in order to provide meaningful feedback, and would recommend we discuss this section at a face-to-face meeting. Also, there is no instruction for Lines 22-23.

We appreciate the opportunity to offer these initial comments. Please contact Dianne De La Mare at ddmare@ahca.org; or call at 202/898-2830, to schedule a mutually convenient time to discuss these issues further.

Sincerely,



Bruce Yarwood
President and CEO