

November 16, 2017

Eric Hargan
Acting Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W
Washington, D.C. 20201

Seema Verma
Administrator
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
200 Independence Ave., SW
Washington, D.C. 20201

Dear Acting Secretary Hargan and Administrator Verma:

The National Consumer Voice for Quality Long-Term Care (Consumer Voice) and the undersigned organizations and individuals strongly oppose current and proposed efforts to revise the nursing home requirements of participation and delay their implementation. Such actions threaten the well-being and safety of frail, vulnerable residents of long-term care facilities. We are writing to request that the Centers for Medicare and Medicaid Services (CMS) retain the regulations as issued in October 2016 and implement and enforce these requirements according to the originally mandated schedule.

These recently revised rules have been years in the making. CMS first began consulting with stakeholders in 2012 and provided multiple opportunities - in writing and in person - for groups representing a range of interests to express their perspective and concerns prior to issuing the proposed rule. When released, the proposed regulations received nearly 10,000 comments.¹ CMS carefully reviewed and evaluated each of these comments, and in the publication to the final rule, provided detailed explanations as to why specific comments were accepted and incorporated, or rejected from the final rule.

As a result, there are now stronger regulations that will improve the quality of care, quality of life, and safety of nursing home residents. These include:

- Greater focus on person-centered care and addressing a resident's individual needs and preferences

¹ <https://www.cms.gov/Newsroom/MediaReleaseDatabase/Press-releases/2016-Press-releases-items/2016-09-28.html>

The National Consumer Voice for Quality Long-Term Care (formerly NCCNHR) is a 501(c)(3) nonprofit membership organization founded in 1975 by Elma L. Holder that advocates for quality care and quality of life for consumers in all long-term-care settings.

- Better planning for resident care
- Improved staff training
- Improved protections against abuse, neglect and exploitation
- Stronger protections against evictions
- Required infection prevention
- A facility assessment to determine what resources are needed to care for residents

The regulations also incorporate current standards of practice that promote professional, resident-centered care to achieve better clinical outcomes.

1. Undermining and rolling back of regulations

Despite the improvement in care and safety these requirements will bring, there are ongoing concerted efforts to undo or weaken the regulations and delay their implementation. We have already seen a new proposed rule issued to rescind protections around forced pre-dispute arbitration.² This rule not only permits arbitration agreements in which residents and their families sign away their constitutional right to a trial by jury before any dispute arises, it authorizes such agreements as a condition of admission. As a result, residents victimized by abuse or neglect would likely have no recourse for justice in the court system if they had signed a mandatory pre-dispute arbitration agreement authorized under the CMS proposed rule.

More rollbacks of regulations appear likely. In May 2017 CMS requested stakeholder feedback on the elimination or modification of regulations related to the grievance process, including reporting of suspected abuse and neglect; the Quality Assurance and Performance Improvement (QAPI) process; and discharge notices to long-term care ombudsmen. The agency also opened the door to wide scale removal or alteration of the regulations by asking for comments about changes in any other areas of the requirements of participation that would result in burden reduction and cost savings to long-term care facilities.³

Elimination or modification of many, if not all, of the current regulations is, in fact, what is being sought by the nursing home industry. Between the trade associations representing for-profit and not-for-profit nursing homes, elimination or revision of the following requirements has been requested:⁴ ⁵

- Facility assessment to determine necessary numbers and type of staff needed to care for residents
- Behavioral health resources to care for the chronically mentally ill
- Documentation by physicians on prescribing decisions
- Release of peer review and root cause analyses to surveyors

² Federal Register / Vol. 82, No. 109 / Thursday, June 8, 2017 / Proposed Rules

³ Federal Register / Vol. 82, No. 85 / Thursday, May 4, 2017 / Proposed Rules

⁴ Letter to HHS Secretary Thomas E. Price from the American Health Care Association/National Center for Assisted Living. March 9, 2017.

⁵ <http://www.leadingage.org/regulation/leadingage-calls-delay-revision-nursing-home-requirements-participation>

- Conversion of room sizes and bathrooms whenever construction/renovations are made
- Infection prevention and control
- Time frame for abuse reporting
- Notices of transfers/discharges to long-term care ombudsmen
- Quality Assurance and Performance Improvement
- Staff training
- Grievance processes

And the push for a drastic revision of the rule is gaining momentum. On October 11, 120 members of the House of Representatives sent a letter to CMS calling for “re-evaluation” of the requirements, citing how burdensome they are to providers. The Senate sent a similar letter to CMS on October 26, 2017.

Each of these provisions targeted to be re-evaluated or rolled back is important to residents and their families. Binding pre-dispute arbitration is unfair to residents and strips them of their rights; the timeliness of reporting allegations of abuse is critical to preserving evidence and obtaining assistance for the victim; staff are often inadequately trained to manage conditions of mental illness and dementia; grievances are regularly ignored and not acted upon by facility administration; and 1-3 million residents experience serious infections each year and up to 380,000 die.⁶ These are just a few examples of how these regulations will make a difference for residents.

Re-evaluating the regulations could open the door to their reversal and the rollback of other important rules, such as the one requiring nursing homes to report their staffing information using a system based on auditable payroll data. Consumers desperately want to know nursing home staffing levels, yet current information has been shown to be flawed. The payroll data rule means that, for the first time, we will have a much more accurate picture of nursing home staffing.

2. Delaying implementation and enforcement

In response to provider concerns about insufficient time to come into compliance with the revised regulations, CMS decided to phase in the requirements and gave nursing homes up to three years to comply (Phases 1, 2, and 3). Even with this additional time, one nursing home trade association requested a complete suspension of the phase-in enforcement of the requirements of participation until the new rule it is requesting is finalized,⁷ while another called for a delay of the effective dates of Phases 2 and 3.⁸ At the same time, a House of

⁶ <https://www.cdc.gov/longtermcare/index.html>

⁷ AHCA letter, March 2017

⁸ <http://www.leadingage.org/regulation/leadingage-calls-delay-revision-nursing-home-requirements-participation>

Representatives letter sent to CMS in October asks the agency to give providers more time to comply.⁹

Rather than considering what is best for, and the impact on, residents, CMS addressed provider concerns regarding the scope and timing of the revised Medicare and Medicaid requirements by announcing a moratorium on enforcement of certain Phase 2 requirements.¹⁰ Since regulations are meaningless unless they are effectively enforced, this delay in enforcement amounts to an additional delay in implementation.

Residents should not have to wait any longer for these - and other - protections. Stronger regulations and timely implementation are needed now more than ever. The requirements of participation have not been updated since they were first issued in 1991. Since that time, the acuity level of residents has increased dramatically. Residents are more frail and dependent, and the majority have some form of dementia. Increased physical and cognitive impairments make residents more vulnerable to abuse and neglect, as evidenced by a CNN investigative report exposing widespread sexual assault in nursing homes across the country.¹¹

The continued prevalence of poor care nationwide also makes timely implementation of more robust rules imperative. Studies and reports continue to show the harm that nursing home residents experience. The U.S. Department of Health and Human Services Office of Inspector General (OIG) report released in 2014 found that approximately one-third of individuals discharged from a hospital to a skilled nursing facility were harmed, and that 59% of the time that harm was “clearly or likely preventable.”¹² Another study found that in 2015 more than one in five nursing homes had violations that caused harm or immediate jeopardy (defined as causing or likely to cause injury, harm, impairment, or death to a resident).¹³ Now is not the time to lessen the oversight and monitoring of these facilities.

Finally, the natural disasters that hit nursing homes within the past several months provide compelling evidence of the urgent need for these stronger standards and for not postponing their implementation. The importance of rules requiring competent staff, sufficient training, and a well-developed facility assessment that determines what resources are necessary to care for residents during emergencies is underscored by the events stemming from Hurricanes Harvey, Irma and Maria and the tragic deaths in Florida.

The updated standards will better protect residents every day and in emergencies. We urge CMS to move forward with implementation of the nursing home rules as promulgated and

⁹ Letter to CMS from 120 Members of the US House of Representatives, October 11, 2017
http://renacci.house.gov/_cache/files/8ad42967-7fd9-4d12-abaa-f65dda6e0426/renacci-rop-final-letter-10.11.17.pdf

¹⁰ CMS Survey and Certification memo: 17-36-NH, June 30, 2017

¹¹ Sick, Raped and Dying in America's Nursing Homes.

<http://www.cnn.com/interactive/2017/02/health/nursing-home-sex-abuse-investigation/>

¹² *Adverse Events in Skilled Nursing Facilities: National Incidence Among Medicare Beneficiaries* (Feb. 2014) OEI-06-11-00370

¹³ *Nursing Facilities, Staffing, Residents, and Facility Deficiencies, 2009-2015*. Prepared by: Charlene Harrington, Ph.D. Helen Carrillo, M.S. University of California San Francisco and Rachel Garfield Kaiser Family Foundation

within the mandated time frames. The revised requirements of participation and the improvements they bring to the safety, health, welfare and rights of residents are needed more than ever before.

Sincerely,

Handwritten signature of Lori Smetanka in cursive script.

Lori Smetanka
Executive Director

Handwritten signature of Robyn Grant in cursive script.

Robyn Grant
Director, Public Policy & Advocacy

NATIONAL ORGANIZATIONS

AARP
Alliance for Retired Americans
Alzheimer's Association
American Federation of State, County and Municipal Employees (AFSCME)
Caring Across Generations
Center for Medicare Advocacy
Community Catalyst
Consumer Action
Justice in Aging
Medicare Rights Center
National Academy of Elder Law Attorneys
National Association of Consumer Advocates
National Association of Local Long Term Care Ombudsmen
National Association of Social Workers
National Association of State Long Term Care Ombudsman Programs
National Committee to Preserve Social Security and Medicare
National Consumer Voice for Quality Long-Term Care
National Disability Rights Network
National Partnership for Women & Families
National Silver Haired Congress
PHI
Public Citizen
Service Employees International Union

STATE ORGANIZATIONS

Alabama	Area 1 Alabama Silver Haired Legislature Middle Alabama Area Agency on Aging West Alabama Area Agency on Aging
Alaska	Alaska Office of the Long Term Care Ombudsman
Arizona	Long-Term Care Ombudsman Program, Area Agency on Aging Region One Northern AZ Council of Governments Office of the Arizona State Long-Term Care Ombudsman Program
California	CA Office of the State Long-Term Care Ombudsman California Advocates for Nursing Home Reform (CANHR) California Long Term Care Ombudsman Association (CLTCOA) California OneCare Caring Hearts of Californian Catholic Charities of Orange County Council on Aging Southern California Daily Kos

Impact Fund
Kern County Long Term Care Ombudsman Program
Law Offices of Ben Yeroushalmi
LTC Ombudsman Services of San Luis Obispo County (CA)
Mother Lode
Ombudsman Service of San Mateo County CA
Ombudsman Services of Contra Costa and Solano
Partners in Care Foundation
Personal Senior Advocates
Pilgrim Place
Soutas Financial & Insurance Solutions Inc.
WISE & Healthy Aging
Yeroushalmi and Associates

Colorado

Care Management & Resources, Inc.
Denver Regional Council of Governments
Disability Law Colorado
Larimer County Long Term Care Ombudsman Program
Northwest Colorado Council of Governements
Region 10/ AAA
South Central Colorado Seniors
South Central Council of Governments
UAACOG - Ombudsman

Connecticut

CT Legal Services, Inc.
Connecticut Office of the Long-Term Care Ombudsman
Waterbury Gardens LTC Resident Council

Delaware

DHHS/Office of the Delaware State Long-Term Care Ombudsman

Florida

Families for Better Care
Florida Long-Term Care Ombudsman
Florida State University Claude Pepper Center

Georgia

CADRE, Inc. (Communities Aligned for Deeply Rooted Elderhood)
Georgia Watch
Legacy Link Long Term Care Ombudsman Program
Middle Georgia Long-Term Care Ombudsman Program
Schenk Smith LLC

Guam

Ombudsman Services Program, Division of Seniors Citizens, Department of Public Health & Social Services

Hawaii

Hawaii Long Term Care Ombudsman Program

Idaho	<p>Area Agency on Aging of North Idaho Carmel Health and Living Resident Council Ombudsman Program, Area IV, Office on Aging</p>
Illinois	<p>AgeOptions Catholic Charities Chrysalis End-of-Life Inspirations Disability Resource Center IALTCO LCBC Illinois Association Long Term Care Ombudsman Illinois-Iowa Center fro Independent Living LAF East Central Illinois Long Term Care Ombudsman Program Illinois Office of the State Ombudsman Program Pintas & Mullins Law Firm Senior Services Associates, Inc. Shawnee Health Service and Development Corporation Southeastern Illinois Agency on Aging, Inc. Stopping Woman Abuse Now The Retirement Research Foundation Western Illinois Area Agency on Aging</p>
Indiana	<p>Indiana University State of Indiana LTC Ombudsman Program The Will Center VOICES, Inc.</p>
Iowa	<p>Office of the State Long-Term Care Ombudsman The Hale Group</p>
Kansas	<p>Kansas Advocates for Better Care Kansas Appleseed Kansas State Long-Term Care Ombudsman Program</p>
Kentucky	<p>Cumberland Valley District Long Term Care Ombudsman KY River District Long Term Care Ombudsman KY State LTC Ombudsman Program at the Nursing Home Ombudsman Agency of the Bluegrass, Inc Long-Term Care Ombudsman Program</p>
Louisiana	<p>Governor's Office of Elderly Affairs, State Long-Term Care Ombudsman Program</p>

Maryland	<p>Baltimore Medical & Surgical Associates PA Calvert County Office on Aging Ombudsman Program Family Council of Ellicoty City HeathCare Center Lakeshore Foundation LTC-Ombudsman Montgomery County, MD Montgomery County Department of Health/Ombudsman Program Montgomery County HHS-Aging and Disability Services Montgomery County MD LTC Ombudsman Program Voices for Quality Care (LTC), Inc.</p>
Massachusetts	<p>Greater Lowell Elder Mental Healh Collaborative LifePath, Inc. Massachusetts Advocates for Nursing Home Reform. Massachusetts Long Term Care Ombudsman Program Massachusetts Silver Legislature SHINE/SHIP Social Work in Progress Tri-Valley, Inc. LTC Ombudsman Program</p>
Maine	<p>Maine Long Term Care Ombudsman Program</p>
Michigan	<p>Area Agency on Aging 3 A Disability Network Southwest Michigan MI Ombudsman Services-Adult Well-Being Services Michigan Disability Rights Coalition Michigan Elder Justice Initiative Michigan Long Term Care Ombudsman Program The Senior Alliance</p>
Minnesota	<p>Elder Voice Family Advocates Kosieradzki Smith Law Firm Minnesota Office of Ombudsman for Long-Term Care</p>
Mississippi	<p>Mississippi Long-Term Care Ombudsman Program</p>
Missouri	<p>Missouri State Ombudsman VOYCE</p>
Montana	<p>Agency on Aging</p>
Nebraska	<p>Nebraska Long-Term Care Ombudsman Program</p>
Nevada	<p>Nevada Long Term Care Ombudsman Program</p>

New Hampshire	New Hampshire State Ombudsman Program
New Jersey	Office of the Ombudsman for the Institutionalized Elderly
New Mexico	La Resolana Senior Apts.
New York	<p>Action for Older Persons Alliance of New York Family Councils ARISE Inc Catholic Charities Center for Independence of the Disabled - New York Center to Advance Palliative Care Elder Justice Committee of Metro Justice of New York Family and Children's Association Hudson Valley Long Term Care Ombudsman Program Independet Living Center of the Hudson Valley Lenox Hill Hospital NYC Lifespan Long Term Care Community Coalition New York Association on Independent Living Northern Regional Center for Independent Living NRCIL New York Office of the State Long Term Care Ombudsman PWVTA Queens College, CUNY Region 9 Long Term Care Ombudsman Program The Alice Center Family Council Tompkins County Office for the Aging</p>
North Carolina	<p>Family Violence Rape Crisis Friends of Residents in LTC</p> <p>Guilford County Nursing Home Committee of Guilford County Council on Aging National Silver Haired Congress NC Coalition on Aging Our Mother's Voice</p>
North Dakota	Office of the North Dakota State Long-Term Care Ombudsman
Ohio	<p>AAA7 Regional Long Term Care Ombudsman Program Joint Office of Citizen Complaints Legacies United Foundation Long Term Care Ombudsman Program, Area Agency on Aging 11, Inc.</p>

Long-Term Care Ombudsman Program Region 10b
Long-Term Care Ombudsman Program, Ohio Region 3
Ohio District 5 LTC Ombudsman Program
Ohio Office of the State Long-Term Care Ombudsman
Region 8 Long Term Care Ombudsman Program
Dayton Ombudsman Office

Oklahoma	Areawide Aging Agency, Inc. Eastern Oklahoma Development District Area Agency on Aging Maples, Nix & Diesselhorst Oklahoma Office of the State Long-Term Care Ombudsman Oklahoma Silver Haired Legislature
Oregon	At Home or Nancy Bradley Oregon Long-Term Care Ombudsman
Pennsylvania	Center for Advocacy for the Rights and Interests of the Elderly (CARIE) Center in the Park Cumberland County Aging and Community Services ElderNet of Lower Merion and Narberth Hickory House Resident Council Pennsylvania State Long-Term Care Ombudsman Program
South Carolina	Connor & Connor, LLC Lower Savannah Long-Term Care Ombudsman Program Our Mother's Voice South Carolina State Long-Term Care Ombudsman Program
Tennessee	NHC Health Care Corporation Public Guardianship for the Elderly Tennessee State Long Term Care Ombudsman
Texas	Area Agency on Aging of Tarrant County, TX Texas Office of the State Long-Term Care Ombudsman Harris County Long-term Care Ombudsman Program NSHC Nursing Home Victim Coalition, Inc Senior Citizens of Greater Dallas, Inc-Dallas County Ombudsman Program Texas Watch The Senior Source The Stone Law Firm
Utah	Davis County Ombudsman Program Mountainland Area Agency on Aging

Utah State of Utah Long-Term Care Ombudsman Program

Vermont

Langrock Sperry & Wool, LLP
Vermont Long-Term Care Ombudsman Project

Virginia

Jefferson Area Board on Aging
Loudoun County Agency on Aging
Well Spouse Association

Washington

Aging and Adult Care of Central Washington
Alzheimer's Association WA St Chapter
Area Agency on Aging & Disability
Area Agency on Aging and Disabilities of SW Washington
EWLTC Ombudsman
Kitsap County Regional Long-Term Care Ombudsman
LTCOP Grays Harbor Pacific Counties
NCW Long Term Care Ombudsman Program
Olympic Area Agency on Aging
Phillips, Krause & Brown, Attorneys at Law
Resident Councils of WA
SNAP-Eastern Washington Region Long-Term Care Ombudsman Program
Spokane Ombudsman Program
Washington Long Term Care Ombudsman Program- SW Region
Washington State LTC Ombudsman Program

West Virginia

West Virginia State Long-Term Care Ombudsman Program

Wisconsin

Wisconsin State Long-Term Care Ombudsman Program

Wyoming

Wyoming State Long-Term Care Ombudsman Program

INDIVIDUALS

Alaska	Ken	Helander		
	Donna	Jamison		
Alabama	Adeleigh	Belyeu		
	Theron	Hendrix		
Arkansas	Harry	Burns		
	Allene	Higgins		
	Amy	Rodola		
Arizona	Laurie	Closset		
	Robin	Drubin		
	Audrey	Lopez		
	Carolyn	Magdaleno		
	Kathy	Naifeh		
	Joanie	Scott		
	Lee	Stanfield		
Kelly	Tighe			
California	Donna	Ambrogi	Sumitra	Joy
	Elizabeth	Anderson	Kimberly	Joyce
	Phyllis	Annett	Karine	Kalista
	Breanna	Bagley	Anne	Kennedy
	Cynthia	Baker	Hester	Klinesteker
	Tom	Barrett	Rhen	Kohan
	Chris	Barrett	Cheryl	Kyle
	Sara	Bartlett	Sean	Laird
	Doris	Beard	Roger	Levin
	Linda	Beck	Cheryl	Lin
	Mark	Beckwith	Tauria	Linala
	Sharon D.	Bell	Devin	Loureiro
	Elizabeth	Boileau	Karl	Lukaszewicz
	A	Bonvouloir	Pamela	M
	Melanie	Boyer	Diana	Maiocco
	Vasili	Brasinikas	Harriet	Marcus
	Delena	Bratton	Kelly	Mason
	Anna	Bruty	Sharon	McCormick
	Mary	Bunn	Linda	Mellen

Linda	Campbell	Rozvita	Miloglav
Gene	Campbell	Lisa	Miranda
Gail	Caswell	Kimberly	Moon
William	Chambers	Jody	Moore
Edmundo	Chavez	Judy	Morrison
Crista	Chelentedos	Patrick	Nakao
Carroll	Child	Mary Lou	Parks
Lesley	Clement	Mary	Parrine
Joan	Clement	Kathy	Pasquetti
Leza	Coleman	Monica	Pedrazzini
Marie	Conroy-Salbi	Matt	Peller
Marilou	Cristina	Krystina	Price
Karen	Deck	Elaine	Roberts Musser
Tracy	Doolittle	Joseph	Rodrigues
Beverly	Drane	Rita	Saenz
Naomi	Dreskin	Dr.	Sen
Joseph	Earley	Karen	Sheehan
Edwin	Ehmke	Sarah	Shena
Marcie	Fast	Ardis	Shubin
Karla	Forest	Enrique	Sierra
Glenna	Francis	Jacquelyn	Simeroth
Sherrill	Futrell	Jo	Simon
Mardi	Garren	Helen	Smith
Ken	Gates	Linn	Spencer Hayes
Carol	Gilbert	Jody	Spiegel
Melba	Gonzalez	Daniel	Steckline
Andy	Greensfelder	Ingrid	Swenson
Karen	Guenther	Yolanda	Tenorio
Sue	Hagan	Michael	Thamer
Mary-Kay	Haines	Ian	Turner
Gail	Hamilton	Pamela	Van Norman
Charlene	Harrington	Nikkita	Villafana
Nicole	Havell	Debra	Vogler
Maxine	Hayden	Elizabeth	Voigt
Lisa	Herman	Edward	Von Runnen
Jillian	Hipschman	Taylor	Wall
Sanford	Horowitz	Diane	Williams
Alice	Horowitz	Barron	Wilson
Marlynn	Howe	Carla	Woodworth
Nicole	Howell	Toni	Yaffe
Joyce	Johnson	Patsy	Yanes
Debbie	Johnston	Ben	Yeroushalmi
Tim	Johnston	Sandra	Zovod

Karen Jones

Colorado

Vernon	Batty	Laci	Orrel
Margaret	Batty	Corey	Orrel
Charles	Black	Laurie	Patterson
Michelle	Burris	Jennifer	Reeves
Erica	Carson	Toni	Romano
Carole	Daves	Amy	Ruble
Mary	Derbort	Stevan	Simich
Terri	Gerstmeyer	Barbara	Ward
Kathy	Getchell	Jean Mills	Aranha
Kenneth	Gibbon	Patricia	Calderone
Eva	Gibbon	Michael	D'Amico
Dorothy	Horton	Jeremy	D'Amico
Kay	Kaylor	Lindsay	Jesshop
Raegan	Maldonado	Ginnie	Preuss
D'Alva	Messina	Margaret	Sellers
Jules	Norwood	Gail	Simon

Delaware

William	Gadola
Meda	Hackett
Kelley	Huff
Jane	Lee
Kristen	Najera

**District of
Columbia**

Sarah	Burger	Jennifer	Lee
Carmen	Castro	Gail	MacInnes
Toby	Edelman	Carissa	Miller
Marcus	Fields	Alia	Murphy
Sara	Hunt	Joy	Nathan Stern
Tippy	Irwin	Mary	Popper
Eagan	Kemp	Kamaria	Sinclair

Florida

Christopher	Benjamin	Janet	Kennedy
Mary Ann	Bishop	William	Kennedy
Jill	Booher	Bryon	L.Reddick
Carol	Buckingham	Judy	Lewis
Garrick	Calandro	Michael	Milliken
Cassidy	Craig	Bettyann	Monash

Kevin	Cronin	Rebecca	Morgan
Hanna	Fink	Joe	Morrissey
Kathryn	Glazer	Winnie	Perez
Pennie	Hahn	Linda	Putnam
Norma	Hawkinson	JoAnn	Quiles
Karen	Kaplan	Paula	Thompson
James	Keim		

Georgia

Pam	Brown	Melanie	McNeil
Marian	Davis	Kaleena	Morgan
Sue	Dorough	Jeanne	O'Brien
Traci	Elmgren	Pat	Porter
Cheryl	Folds	Will	Smith
Camille	Godwin	Windy	Spell
Sybil	Griffis	Suzanne	Spivey
Jeff	Helms	John	Suthers
Nancy	Hill	Susan	Ursrey
Tyler	Hrabar	Tom	Wade
Cindy	Igou	Shirley	Williamson
Louise	Lupica	Elaine	Wilson

Hawaii

John	McDermott
Laura	Ozak

Idaho

Timothy	Doherty
Denise	Myler

Illinois

Farishta	Ahmadi	Chuck	Miller
Daisy	Ayllon	Donna	Miskiewicz
Ken	Baldauff	Colleen	Mixan
	Battersby		
Margaret	Black	Yazmin	Morales
Jessica	Belsly	Mallory	Moreno
Michael	Bonamarte	Laura	Mullins
Julia	Bonamarte	Amro	Mustafa
Julie	Brennan	Jacqueline	Neri
Margarite	Brooks	Margaret	Niederer
Robin	Carlson	Susan	No
James	Coogan	Nicole	Ott
Tim	Crane	Thomas	Paris
Latoya	Crayton	John	Perconti
Daniel	Diamond	Tracie	Ramel-Smith

Pamela	Dimo	Cheryl	Reid
Jon	Douglas	Christine	Reynolds
Jared	Duke	Jared	Reynolds
Jeanene	Edmison	Bruce	Roe
Wafeek	Elafifi	Michael	Shanahan
Paulina	Eudave	Whitney	Smith
Lawrence	Finn	Joan	Stehulak
Michele	Francis	Jordyn	Stow
Eric	Kang	Sheri	Supena
Catherine	King	David	Sutor
Jaime	Koziol	David	Sutterfield
Ian	Lapidus-Saltz	Marvet	Sweis
Christian	Luciano	Mary	Vandeloo
James	Lynch	Nathaniel	Wallace
Andrew	Manno	Maria	Witvliet
Jeff	Marthon		
Eric	Meli		

Indiana	Margaret	Adamek	Renee	Miranda
	David	Farnbauch	Patrick	Schroeder
	Robyn	Grant	Glenda	Schultheis
	George	Gray	Ada C	Shaum
	Marcia	Greene	Mary	Swinford
	Rebecca	Kasha	Tracy	Thread
	Susan	May	Susan	Wack

Iowa	James	Cook		
	Jennifer	Golle		
	Dean	Lerner		
	Leonard	Sandler		
	Catherine	Stone		

Kansas	Judith	Bellome	Jennifer	Johnson
	Linda	Carlsen	Linda	Mason
	Melissa	Dinsmore	Earl	Nehring
	Beverly	Erichsen	Laura	Pfeifer
	Margaret	Farley	Camie	Russell
	Pamela	Frye	Claire	Shanovich
	Lenette	Hamm	Lisa	Van Dusen

Kentucky	Miranda	Bivins	Arlene	Gibson
	Robin	Boggs	Jodi	Holsclaw
	David	Bohannon	Heather	Hopton
	Sandra	Bowen	Lynda	Love
	Bethany	Breckel	Susan R	McCray
	Bethany	Breckel	Mary	Melton
	Natalie	Brown-Rodtke	Juliette	Symons
	Mary June	Brunker	Jay	Vaughn
	Mark P.	Burrress	Jessica	Wayne
	Mark	Burrress	Denise	Wells
	Diana	Clewett	Mandy	Weston
	Sherry	Culp		
	Mary Kay	Flege		
Louisiana	Lynette	Bech		
	Walter	McClatchey		
Maine	Suzanne	Bessette		
	Jane	DiPaolo		
	William	Tibby		
Maryland	Anne	Arrington	Cheryl	McFalls
	Holly	Baier	Camilla O.	McRory
	Bree	Baldwin	Sharon	Miller
	Carol	Benner	Martha	Mohler
	Eileen	Bennett	Tenesha	Moore
	Louise	Bounds	Pat	Moose
	Mary Anne	Brennan	Samuel	Odulana
	Darlington	Brima	Nelson	Pais
	Amanda	Celentaro	Tyra	Phipps
	Barbara	Cornman	Patricia	Powers
	Stevanne	Ellis	Mary	S
	Charlene	Fitch	Liz	Salter
	Marianne	Follingstad	Lorraine	Schack
	Deborah	Hamilton	Jeffrey	Schwamm
	Mari Anne	Hamilton	Daniel	Shneyer
	Alice	Hedt	Lori	Smetanka
	Joel	Hirschhorn	Karen	Spinner
	William	Jones	Gloria	Teasley
	Richard	Jourdenais	George	Trainor
	Edward	Ketchen	David	Ward
Linda	Kontnier	Roger	Weinberg	

Linda
Arthur
Kathy

Lannom
Lappen
Lockhart

Rachel
Joyce
Phyllis

Wilt
Wolpert
Zander

Massachusetts

Martin
Lois
Adrita
Terry
Patti
Charles
Charlie

Alintuck
Ambash
Barooah
Carlo
Cheever
Cunningham
Daniels

Robert
Brian
Alexis
Karen
Colleen
Pamela
Terrence

Kelliher
Kiwanvka
Levitt
Montgomery
Morrisey
Nadash
O'Malley

Henry Quincy
Kevin
Beverly
John
Renee
Michele
Arlene
Gretchen
Debbie

Dowd
Eddings
Flanagan
Flanagan
Freedman
Gaythwaite
Germain
Hahn
Hoey

Monica
Scott
Roberta
Penny
T. P.
Krzysztof
Cathy
Deb
Ellery

Osterman
Plantier
Schwalbe
Shaw
Sherman
Sobczak
Stone
Thomson
Schempp

Michigan

Thomas
Debbie
Denise
Debra
Raymind
Allison
Laurie
Valeria
Cean
Cindy
Laura
Connie
Richard
Ahnuh
Kim
Dakima
Donna
Kelly
Mary

Appel
Chambers
Chegash
Clawson
Cummings
Cummings
Ehrhardt
Elmore
Eppelheimer
Evertsen
Foerster
Grahovoc
Han
Hayes
Hodge
Jackson
Johnston
Jonker
Katsarelus

Tammy
Bethany
Courtney
Faiza
William
Riana
Elizabeth
M GARY
Dawn
Joan
Kaye
James
Maureen
Richard
Sara
Jerome
Jon
Hollis
Louise

Lynch
McGlinchey
Merkey
Najar
Nucon
Pearce
Prevot
Robertson
Roffey
Schliem
Scholle
Schuster
Sheahan
Snyder
Socia
Stevens
Tabor
Turnham
Verbeke

Edmund	Kowalski	Kristin	Williams
Janice	Livesay	Lillie	Williams

Minnesota

Kay	Bromelkamp	Christine	Hupe
Lindsey	Bye	Rosalie	Kane
Josh	Casper	Kathy	Merkel
Heather	Davila	Maria	Michlin
Christine	Dougherty	Sherilyn	Moe
Iris	Freeman	Jane	Overby
Sharon	Guzman	Barbara	Risken
Cheryl	Hennen	Anne	Sterner

Missouri

Julie	Berkowitz	Susan	Lundquist
Cecelia`	Bishop	Reva	Mays
	Boyer-		
Arden	Stephens	Courtney	Mitchell
Richard	Corbet	Connie	Payne
Pat	Felton	Miriam	Rodin
Brad	Kendall	Elizabeth	St-John
		Sherrill	Wayland

Mississippi

Ann	Williams
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Montana

Mary	Dalton
Todd	Davis
Vanessa	Fitchett
Marie C.	Infante

New Hampshire

Susan	Buxton
Charles	Gerhan
Nancy	Jerauld
Marion	Mengert

New Jersey

Amy	Brown	Laurie	Lynch
Michael	Brusca	Diane	McGeehan
Jane	Fearn-Zimmer	Paul	Netusil
Marvin	Feil	Nikiah	Nixon

Tim	Foley	Gwen	Orlowski
Charles	Holm	Dana	Shilling
Mary Ellen	Jacobs	Richard	Stern
Carol	Jagiello	Janis	Todd
		James	Woods

New Mexico	William	Beerman
	William M	Waugh Jr

Nevada	Marie	Coe
	Peter	Reed
	Stephanie	Schneider
		Williams-
	Jennifer	Woods

New York	Marion	Anders	Carole	Kyer
	Marianne	Artusio	Stephanie	Leslie
	Kathleen	Austin	Nancy	Lewis
	Yevgeniy	Ayrapetov	Janice	Linehan
	Bryan	Berman	Robert	Mackreth
	Larkia	Bigby	Susanne F.	Maloy
	Yvette	Boisnier	James	McKillip
	Patricia	Bradfuhrer	Patty	McPhilty
	Matthew	Bradley	Sandy	Meyers
	Sharon	Brown	Ellen	Mollen
	Cheryl	Burger	Christine	Murphy
	George	Cabrera	Mark	Nadel
	Linda	Cezanne	Warner	Norton

Abby	Comstock-Gay	Susan	Novak
Kathy	Connor	Carolyn	O'Neil
Lamanda	Cook	Lori	Parker
Ken	Coughlin	Lorraine	Petrie
Linda	Cowit	Patricia	Pfeifer
Karen	Crater	Joanne	Powles
Joseph	Damico	Mary	Pritchard
Howard	Davidson	Nicholas	Prychodko
D	Davis	Valerie	Ray
Fiona	Dejardin	Beverly	Reeve
Delores	Dickerson	Albina	Rennie
Dorothy	Dooren	Beverly	Rice
Eileen	Driscoll	Nancy	Richardson
Ellen	Earle	Carolyn	Riley

Cynthia Eaton
Arnold Elman
Joanne Esposito
Wendy Fast
Marianne Flynn
Mary Frey
Susan Friederich
William Friedlander
Debra Frink
Mary Ann Gagliardi
Sarah Gallagher
Ron Gardner
Victoria Garwood
Amy Gehrig
Dolores Genentz
Paul Ghenoiu
Emma Gonzalez
carol h Goodfriend
Margaret Graham
Sandra Havlen
Eleanor Herman
William Hyman
Lenore Jaffe
Sherisa Jarvis
Yvonne Johnson
Jeanne Jones

Clare Juddson Kagel
Laurie Kash
Betsy Kates
John Keevert
Peter Keiser
Kathleen Keske
Marcia Knapp
M. Paula Knitter

North Carolina Jennifer Albright
Carol Allison
Elaine Anlyan
Nicole Applefield
Stephen Bried
Judith Bronski
Annetta Brown

Cynthia Roberts
Betsy Rogers
Cynthia Rudder
Alana Russell
Phillip Saperia
Christine Scheible
Al Schnucker
Janet Serva
Jennie Shatynski
Jennifer Sibley
Lorna Silinovich
Lee Smassanow
Amanda Smith
Richard Stern
Sharon Stevens
Peter Stone
Susan Streichenwein
Susan Susman
Akiko Takano
Thomas Talbot
Christian Taylor
Bea Trainham
Kenneth Traub
Zacharie Trombley
Allen Tsao
Catherine Unsino

Coleen Vance
Breverly Vandenburg
Tom Walkowicz
Sharon Warner
Alice Weather
Barry White
Mary Jane Wolper
Cathie Wooledge

Sheila Lewis
Pat Martin
Doris McDonald
Patricia Millen
Ida Mills
Michelle Mitchell
Dr. Terry Oliver

Heather
Bennett
Dana
Autumn
Norma
Deana
Cindy
Julia
Emily
Suzanne
Carol
Laura
Brandi
Hillary
Irene
M
Michael

Cooke
Cotten
Courtney
Cox
Duncan
Doub
Englert
Gibson
Gordon
Haff
Hay
Jett
Jordan
Kaylor
Kennedy
Lamb
Levandoski

Pamela
Victor
Pam
Denise
Virginia
Patti
Kelly
Aimee
Judith
Margaret
Catherine
Jack
Margaret
Laura Jane
Mary
Sharon
Betty

OQuinn
Orija
Palmer
Rogers
Rogers
Sacchetti
Shuler
Smith
Stanton
Toman
Turner
Van Dijk
Villani
Ward
Warren
Wilder
Williamson

Ohio

Eileen
John
Jeni
Cynthia
Joseph
Daniel
John
Barbara
Patrick
Mark
Steve

Beal
Bombrys
Coyne
Harley
Hripko
Inscore
Logan, Jr.
McDaniel
Murphy
Napier
Nemeth

Megan
Erin
O'Retha
Barbara
Rita
Laura
Betty
Teresa
Donna
Cheryl

Oiler
Pettegrew
Phillips
Prociak
Roberts
Smart
Stutler
Teepie
Wooton
Zimmerman

Oklahoma

Shea
Dorothy
Elaine
Esther
Ray
Janine

Bracken
Cassel
Evans
Houser
Maples
McCullough

Tim
Shawanna
Patricia
Ruth
Jerry

Nicholson
Nixon
Shidler
Tatyrek
Wainscott

Oregon

Janay
Anna
Dolores
Ann

Haas
Helm
Hubert
McQueen

Serena Worthington

Pennsylvania

Erika	Barber	Norma	Kline
Pam	Barton	Hope	Kubik
Jan	Brown	Sharon	Liebhaber
Anne Marie	Bryan	Vinnette	Love
Nora	Buck	Robert	Marino
Mary	Cappelli	Jordan	Marzzacco
Peter	Caracci	David	Miller
lillissn	Cohen	Angela	Miller
Joanne	Cohen	H Edmund	Petersohn
Jennifer	Costello	Joan	Phillips
Rosemary	delPino	Lynda	Pickett
Harry	Dorian	Adena	Potok
Janice	Duffin	David	Reeder
Kathy	Esibill	Alison	Rogalski
Norm	Esibill	Lisa	Schilansky
Marisa	Feaster	Sally	Schoffstall
Joanne	Gibbs	Sheldon	Schwartz
David	Grub	Susan	Shaak
Lynn	Harris	W. Andrew	Stover
Jessica	Hartfield	Caroline	Stritzinger
Stephen	Held	Diane	Strock
Leslie	Hoover	Lori	Walsh
Cher	Howard	Batya	Warshowsky
Churchill	Huston	Cynthia	Wishkovsky
Elizabeth	Huston	Alison	Young
Alan	Iser	Jean	Zimmerman
Morris	Kaplan		

Rhode Island

Kathleen	Heren
Anthony	Leone
Annette	Manigan

South Carolina

Kathy	Bradley	Ray	Mullman
June	Cattell	Jennifer	Sherbow
Harold and			
Connie	Christian	Tasia	Stackhouse
Claire	Glasson	Dale	Watson
Jeanne	Lun	Jessica	Winters
Theile	McVey		

South Dakota	Lia Harriet	Azeal Scott		
Tennessee	Alicia Steve Mary Lu Ben Iris	Browning Ebbers Estep Miller Tollett		
Texas	Steve	Benton	Karen	Magruder
	Arthur J.T. Misty Deborah Melanie Gene Dawn Nora Teressa Alicia Katie Jordan Libby Marisol Marsha Sarah Ryan Seraphina Jackie Kimberly Meghan Shannon James Emliy Maya Roy	Black Borah Breaux Burkham Calhoun Carnicom Casebeer Cubillos Davis de Jong-Davis Dickinson Douglas Edwards Espinal Evans Ewalt Ewalt Francisco Friedman Gaston Hutchinson Jones Klein Klespis Lazarus Levin	Shannon Cortney Lydia Beth Terry Joretta Barbara Cindy Amalia John Courtney Lauren Jonathan Margie Suzanna Nancy Ernest Anna Rocio Louise David Triste Tamra Nancy Shirley	Mcelvany-Ballard Nicolato Nunez Landry Oldham Patch Price Raudonis Rubin Segovia Sehnert Smith Smith Squyres Steele Sulfstede Threadgold Tosh Trevino Vega Watkins Whitby White Williams Wilson Woodard
Utah	John Amberly Johna Debbie Paul	Cowan Dattilo Harrison Miller White		

Vermont
Katrina Boemig
Paul Caron
Howard Fisher
Alice Harter
Judith Hazelton
Fran Keeler
Timothy Riley
Wendy Rowe
Nancee Schaffner

Virginia
Jean Boston Suzanne Grubb
Howard Brown Ronald Karpick
Lisa Callahan Betty G Kenley
Bob Carr Joani Latimer
Megan Descutner Joan Mahal
LuAnne Eggleston Mary Ann Parker
Harriet Epstein Susan Peyton
Stephen Grammer Brenda Thompson

M Villanigro-Santiago

Washington
Dannie Anderson Lora Lehner
Martha Anthony Roger Leslie
Marguerite Brizee Dean Libey
Natasha Carmona Robin Low
Marlene Chasson Mary Martin
Jill Cline Sandra McDonald
Deirdre Cochran Terry McKenna
Marcia Cotlove Leslie Muller
Judy Current James Peck
Bernadette Dominguez Sylvia Peterson
Deawn Herrmann Pauline Pos
Paula J Hinton Glenda Reed
Maureen Jackson Janet Schennum
J. Johnson Alice Walz
Lisa Kromrei Ardeth Weed
Mary Kay Landis
Cathy Larson

Wisconsin
Nykiel Christine

Jayne	Mullins
Lillian	Nordin
Carole	Williams

Wyoming

Tera	Gillett
Analyn	Reader