

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.<sup>1</sup> 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

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<sup>1</sup> <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.<sup>2</sup> 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.<sup>3</sup>

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:<sup>4</sup> <sup>5</sup>

- 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

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

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

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

<sup>5</sup> <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.<sup>6</sup> 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,<sup>7</sup> while another called for a delay of the effective dates of Phases 2 and 3.<sup>8</sup> At the same time, a House of

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

<sup>7</sup> AHCA letter, March 2017

<sup>8</sup> <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.<sup>9</sup>

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.<sup>10</sup> 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.<sup>11</sup>

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.”<sup>12</sup> 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).<sup>13</sup> 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

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<sup>9</sup> 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](http://renacci.house.gov/_cache/files/8ad42967-7fd9-4d12-abaa-f65dda6e0426/renacci-rop-final-letter-10.11.17.pdf)

<sup>10</sup> CMS Survey and Certification memo: 17-36-NH, June 30, 2017

<sup>11</sup> Sick, Raped and Dying in America's Nursing Homes.

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

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

<sup>13</sup> *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,



Lori Smetanka  
Executive Director



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 &amp; 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 &amp; 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

<b>Alaska</b>	Ken	Helander		
	Donna	Jamison		
<b>Alabama</b>	Adeleigh	Belyeu		
	Theron	Hendrix		
<b>Arkansas</b>	Harry	Burns		
	Allene	Higgins		
	Amy	Rodola		
<b>Arizona</b>	Laurie	Closset		
	Robin	Drubin		
	Audrey	Lopez		
	Carolyn	Magdaleno		
	Kathy	Naifeh		
	Joanie	Scott		
	Lee	Stanfield		
Kelly	Tighe			
<b>California</b>	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		

<b>Indiana</b>	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

<b>Iowa</b>	James	Cook		
	Jennifer	Golle		
	Dean	Lerner		
	Leonard	Sandler		
	Catherine	Stone		

<b>Kansas</b>	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

<b>Kentucky</b>	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.	Burruss	Jessica	Wayne
	Mark	Burruss	Denise	Wells
	Diana	Clewett	Mandy	Weston
	Sherry	Culp		
	Mary Kay	Flege		
<b>Louisiana</b>	Lynette	Bech		
	Walter	McClatchey		
<b>Maine</b>	Suzanne	Bessette		
	Jane	DiPaolo		
	William	Tibby		
<b>Maryland</b>	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

<b>Minnesota</b>	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

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

<b>Mississippi</b>	Ann	Williams
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<b>Montana</b>	Mary	Dalton
	Todd	Davis
	Vanessa	Fitchett
	Marie C.	Infante

<b>New Hampshire</b>	Susan	Buxton
	Charles	Gerhan
	Nancy	Jerauld
	Marion	Mengert

<b>New Jersey</b>	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

<b>New Mexico</b>	William	Beerman
	William M	Waugh Jr

<b>Nevada</b>	Marie	Coe
	Peter	Reed
	Stephanie	Schneider
		Williams-
	Jennifer	Woods

<b>New York</b>	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		



<b>South Dakota</b>	Lia Harriet	Azeal Scott		
<b>Tennessee</b>	Alicia Steve Mary Lu Ben Iris	Browning Ebbers Estep Miller Tollett		
<b>Texas</b>	Steve	Benton	Karen	Magruder
	Arthur	Black	Shannon	Mcelvany-Ballard
	J.T.	Borah	Cortney	Nicolato
	Misty	Breaux	Lydia	Nunez Landry
	Deborah	Burkham	Beth	Oldham
	Melanie	Calhoun	Terry	Patch
	Gene	Carnicom	Joretta	Price
	Dawn	Casebeer	Barbara	Raudonis
	Nora	Cubillos	Cindy	Rubin
	Teressa	Davis	Amalia	Segovia
	Alicia	de Jong-Davis	John	Sehnert
	Katie	Dickinson	Courtney	Smith
	Jordan	Douglas	Lauren	Smith
	Libby	Edwards	Jonathan	Squyres
	Marisol	Espinal	Margie	Steele
	Marsha	Evans	Suzanna	Sulfstede
	Sarah	Ewalt	Nancy	Threadgold
	Ryan	Ewalt	Ernest	Tosh
	Seraphina	Francisco	Anna	Trevino
	Jackie	Friedman	Rocio	Vega
	Kimberly	Gaston	Louise	Watkins
	Meghan	Hutchinson	David	Whitby
	Shannon	Jones	Triste	White
	James	Klein	Tamra	Williams
	Emliy	Klespis	Nancy	Wilson
	Maya	Lazarus	Shirley	Woodard
	Roy	Levin		
<b>Utah</b>	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  
Howard Brown  
Lisa Callahan  
Bob Carr  
Megan Descutner  
LuAnne Eggleston  
Harriet Epstein  
Stephen Grammer  
Suzanne Grubb  
Ronald Karpick  
Betty G Kenley  
Joani Latimer  
Joan Mahal  
Mary Ann Parker  
Susan Peyton  
Brenda Thompson  
M Villanigro-Santiago

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

**Wisconsin**  
Nykiel Christine

Jayne  
Lillian  
Carole

Mullins  
Nordin  
Williams

**Wyoming**

Tera  
Analyn

Gillett  
Reader