

**CANDACE McLAREN LANHAM**  
*Chief Deputy Attorney General*



**SARAH E. PENDLEY**  
*Principal Counsel*

**CAROLYN A. QUATTROCKI**  
*Deputy Attorney General*

**PETER V. BERNIS**  
*General Counsel*

**LEONARD J. HOWIE III**  
*Deputy Attorney General*

**STATE OF MARYLAND**  
**OFFICE OF THE ATTORNEY GENERAL**  
**MARYLAND DEPARTMENT OF AGING**

**CHRISTIAN E. BARRERA**  
*Chief Operating Officer*

**ZENITA WICKHAM HURLEY**  
*Chief, Equity, Policy, and Engagement*

**ANTHONY G. BROWN**  
*Attorney General*

**RAJNI K. SEKHRI**  
*Assistant Attorney General*

**TO:** Maryland Health Care Commission Staff

**FROM:** Sarah E. Pendley, Assistant Attorney General & Principal Counsel  
Rajni K. Sekhri, Assistant Attorney General

**RE:** Comments to Proposed Revisions to COMAR 10.24.20

**DATE:** August 18, 2024

Please see below comments from Sarah E. Pendley, Assistant Attorney General & Principal Counsel at the Maryland Department of Aging, and Rajni K. Sekhri, Assistant Attorney General at the Maryland Department of Aging, regarding the proposed revisions to COMAR 10.24.20:

1. COMAR 10.24.20.04A(1)(b)(iii): Replace “is” with “in.”
2. COMAR 10.24.20.05A(3)(d), third line: Add “Maryland” before “Department of Aging.”
3. COMAR 10.24.20.05A(8)(a), last line: Query whether “Commission” should be capitalized.
4. COMAR 10.24.20.05A(8)(g), first line: Query whether “Approval” should be lowercase, *i.e.*, “approval.”
5. COMAR 10.24.20.06B(4)(b)(iv): Change “designed” to “designee.”
6. COMAR 10.24.20.06C(5), first line: Change “bed” to “beds.”
7. COMAR 10.24.20.08B(12): Parts of this definition of “continuing care” are substantively inconsistent with the Maryland Department of Aging’s separate definitions of “continuing care” in COMAR 32.02.01.01 and Section 10-401 of the Human Services Article. Consider modifying this definition to read: “‘Continuing care’ means furnishing shelter and services, as applicable, consistent with the requirements of the Maryland Department of Aging.”
8. COMAR 10.24.20.08B(13): Change “Office on Aging” to “Maryland Department of Aging,” and delete “Parts I-V and VII-IX.”
9. COMAR 10.24.20.08B(26)(a): Add “Maryland” before “Department of Aging” and change the outdated reference of “Article 70B, Annotated Code of Maryland” to “Title 10, Subtitle 4, of the Human Services Article of the Annotated Code of Maryland.”
10. COMAR 10.24.20.08B(37): This definition states that there are 112 senior centers in Maryland, but the Maryland Department of Aging’s website states there are 117 senior centers (<https://aging.maryland.gov/Pages/senior-centers.aspx>). It is suggested to delete this entire sentence since this number is not stagnant.