



8/5/2021

Department of Health
 625 Forster Street
 Harrisburg, PA 17120
 Attn: Lori Gutierrez, Deputy Director
 Office of Policy

Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)

To Whom it May Concern,

Please accept this letter of comment on the recently proposed rule, "Department of Health, Title 28. Health and Safety, Part IV. Health Facilities, Subpart C. Long Term Care Facilities, 28 Pa. Code §§201.1-201.3: 211.12(i), Long Term Care Nursing Facilities".

This letter is being sent on behalf of the residents we serve and the direct care staff of Mid-Valley Health Care Center. Our nursing facility is a 38 bed facility located in Peckville, Pennsylvania. We employ 50 employees and provide services to 38 residents. As the Nursing Home Administrator, I can attest to our facilities commitment to providing high quality care and prioritizing the needs of the residents we serve each and every day.

After reviewing the proposed regulation, we have grave concerns regarding the amendments to increase the required minimum number of hours of general nursing care from 2.7 to 4.1 hours for each resident and excluding other direct care provided by essential caregivers.

We are having staffing challenges daily with many open positions within our nursing department. We continue to advertise our open positions, offer sign on bonuses and offer a flexible working schedule with no avail. When we do receive applications we follow up immediately with the applicant. They either do not show up for the scheduled interview or accept the job offer or don't return.

It is challenging to achieve the hours that are required now and would be impossible for us to maintain a staffing pattern of 4.1 hours of general nursing care per resident. If other essential care workers who provided resident care were included in this number it would be possible. Essential care workers who would be included in this number would include physical, occupational, speech therapists, dieticians, infection control and wound care nurses, and activities directors.

Thank you for your time in reviewing and considering our comments. We are hopeful that the Department will amend the provisions contained in §211.12(i) in a manner that will address the concerns raised in our comments.

Sincerely,

Lisa Gallagher-Jones, NHA

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