



Gutierrez, Lori

From: Ryan Gallagher <Ryan.Gallagher@saberhealth.com>
Sent: Thursday, August 5, 2021 2:12 PM
To: DH, LTCRegs
Cc: 'advocacy@phca.org'
Subject: [External] Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)

Importance: High

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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 Dresher Hill Health and Rehabilitation Center. Our nursing facility is a 118 bed facility located in Fort Washington, Pennsylvania. We employ 102 employees and provide services to 103 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.

Our Facility has a multitude of staffing challenges. We have done an across the board wage increase for our nurses and aides along with sign-on bonuses. All of our department heads are trained as personal care aides. The Director of Nursing and I frequently meet with our staff and have an active employee retention calendar. We have daily staffing meetings. We give shift differentials and large shift pick up bonuses. I personally handle calling all of the applicants immediately once I receive their application day and night. We have had multiple job fairs and mailers sent out to nurses and aides within a 25 mile radius. We also utilize agency nurses and aides when they are available. Despite all of our efforts, staffing remains a continued challenge.

With considering to have a new state minimum PPD of 4.1, I would like to propose that the other essential care services that work in Nursing Homes be factored into this. Examples of other essential care workers should include Physical therapists, occupational therapists, dieticians, wound care nurses and activities directors.

Quality measures, resident outcomes and satisfaction surveys are what we review in order to ensure that we have adequate staffing levels. The Facility Assessment has a myriad of components which include resident acuity, types of diseases, physical and cognitive disabilities, staff competencies, physical plant environment, equipment etc. There is In-Service staff training on the specific areas we identify. We have Admission practices and Leadership support as well to ensure adequate staffing. We increase staff when we have an increase in admissions or for special events. For discharges we decrease staffing.

The staff and I dedicate our lives to the residents of Pennsylvania. We spend more time with our residents than we do with our own families. Staffing needs are unique to each nursing facility. I can ensure you that Dresher Hill Health and Rehabilitation Center provides the care that the residents require! *More staff does not necessarily equal better outcomes.*

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,
Ryan Gallagher, NHA

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