



Gutierrez, Lori

From: Goode, Marie <mgoode@lutheranhomekane.org>
Sent: Wednesday, August 4, 2021 11:43 AM
To: 'advocacy@phca.org'; DH, LTCRegs
Subject: [External] Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)

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08/04/2021

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 the Lutheran Home at Kane. Our nursing facility is a 90 bed facility located in McKean County, Kane, Pennsylvania. We employ 135 employees and provide services to a current census of 75 residents which we are holding due to staffing already. As the Director of Nursing, 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. We never run our PPD at 2.7. We are very committed to meeting 3.2 daily PPD. However, we struggle continually to obtain and keep staff. We live in a very rural area and compete with waging from the local convenience stores. We have a small pool to pull from. I would love to have the staff to be able to reach a 4.1 PPD however, this is unrealistic for us. If it comes to that, I am afraid that we would have to decrease our census or perhaps close our doors. We are a stand-alone facility and with no proposed means to support this proposed rule, we would struggle financially. While I agree that the PPD does need and increase, the proposed jump from 2.7 to 4.1 is not feasible. Please think long and hard regarding the hardships you will cause facilities like ours prior to making an unworkable decision with devastating consequences.

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.

Thank you for your consideration in this matter,

Marie Goode, RN, BSN, LTCDNC
Director of Nursing

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