



**From:** [Laura Graham](#)  
**To:** [DH.LTCRegs](#)  
**Cc:** [advocacy@phca.org](mailto:advocacy@phca.org)  
**Subject:** [External] Proposed Staffing Increase  
**Date:** Monday, August 2, 2021 12:04:08 PM  
**Attachments:** [Outlook-ib2vcdyn.png](#)

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8/2/2021

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 Springfield Rehabilitation and Healthcare Center. Our nursing facility is a 100 bed facility located in Springfield, Pennsylvania. We employ 150 employees and provide services to 80 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.

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,

Laura Graham, LNHA  
Administrator  
Springfield Rehabilitation and Healthcare Center  
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