



Director, Department of Health,

I would like to make some general comments about the proposed updates to PA Bulletin Volume 51, Number 31 concerning "DEPARTMENT OF HEALTH [28 PA. CODE CHS. 201 AND 211] Long-Term Care Nursing Facilities". First, I appreciate that there is an explanation of what and why of the proposed changes before the mark-up of the document. The staff did a great job in making the information as clear as possible. I also like the updating of the terminology used – this is very helpful.

Over the last dozen years, I have helped MSN students conduct some research on Pennsylvania long-term care facilities and I found out that they fall short of what I would expect of these facilities in the 21st century. I have recent experience with a case in the Williamsport and Wellsboro area – bordering on criminal. This was in part due to the lack of adequate nursing staff at the facilities. I see the need to increase the number of direct nursing hours per patient as this has always been a problem.

The only issue I have with the proposed change is the following:

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The definition of "proprietary drug" will be deleted and replaced with the definition of "non-prescription medication." The shift from the use of the term "proprietary drug" to "non-prescription medication" reflects a change in terminology used in the long-term care nursing environment. The definition will also be changed to reflect common usage of this term to refer to an over-the-counter medication that is purchased without a prescription. The definition of "nonproprietary drug" will be deleted. The use of the word "prescription" more accurately reflects the current terminology that is used. The existing definition of the word "prescription" will be updated to: (1) replace the word "drugs" with the word "medications" to reflect current terminology; (2) replace the words "licensed medical" with "health care" before the word "practitioner" for consistency with the use and meaning of the term "health care practitioner" in this subpart; and (3) delete the word "his" to make this definition gender neutral.

[proprietary drug – **a drug that has a trade name and is protected by a patent** (can be produced and sold only by the company holding the patent) brand-name drug.

<https://www.thefreedictionary.com › proprietary+drug>

Someone has a skewed view of medications.

Again, I think this was a tremendous improvement. I also appreciate that the state is trying to make improvements incrementally – the set of five is a great idea.

Sincerely,

//Rev. Dr. Michael E Harris//

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