



From: mordy.lahasky
To: DH.LTCRegs; advocacy@phca.org
Subject: [External] Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)
Date: Monday, August 2, 2021 12:50:21 PM
Attachments: [staffing article.pdf](#)

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I am respectfully writing in regards to the proposed regulation to increase direct nurse staffing in nursing homes to 4.1 hours.

The harsh reality is that the state of Pennsylvania does not have enough certified personnel to cover a 4.1 ppd. In fact we are struggling so mightily on some days just to cover our shifts without the state increasing the the mandated staffing by 50 pct. We already have taken measures to bring in staff from other states and house them just to try to cover our open shift. We also also paying hundreds of thousands of dollars into the union's employee training fund in an attempt to get more employees certified to be able to work as direct care employees. As a last resort we are also using staffing agencies which are incredibly expensive and because the agency employees are going from facility to facility they are not familiar with our residents and are very prone to mistakes that do cause quality of care issues.

For the state of Pennsylvania to mandate a 50 pct increase in staffing requirements without establishing programs to generate more CNA's, LPN's and RN's in the state, then effectively the State is throwing an unbearable burden on the operators without taking any responsibility for recruiting and training staff. This is essentially setting up the operators to fail. Additionally, this in no way will help with reducing Covid as the more employees and vendors that enter the facility increases the likelihood of the spread of Covid in the facility. In fact this policy will force the facilities to use more Per Diem and Agency employees that will only increase the spread of Covid in the facilities. Please see the attached article reports on a study from the University of Rochester that demonstrates that point quite well. I would be happy to sit with the State to collaborate on solutions for the issues that are happening in nursing homes and try to come up with solutions that can work and benefit all the nursing home residents in the state.

Truly Yours,

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