



From: [Shelly Phillips](#)
To: [DH.LTCRegs](#)
Cc: advocacy@phca.org
Subject: [External] Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)
Date: Monday, August 2, 2021 12:02:02 PM
Importance: High

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Hello,

Department of Health
625 Forster Street
Harrisburg, PA 17120
Attn: Lori Gutierrez, Deputy Director
Office of Policy

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 who work at Quality Life Services. As the Director of Business Office Services, I oversee Billing for ten nursing homes operating across the Commonwealth. Collectively, these facilities are licensed for 460 beds, employ 1100 employees and serve 750 residents. Our organization is committed to providing high quality care and prioritizing the needs of the residents we serve each and every day.

After reviewing your proposed regulation, we have concerns regarding the mandatory increase of the minimum number of hours of general nursing care from 2.7 to 4.1 hours for each resident, which excludes other direct care provided by essential caregivers.

Thank you,

Shelly Phillips

Director of Business Office Services

Quality Life Services

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