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Sent: Thursday, August 5, 2021 1:39 PM
To: DH, LTCRegs
Cc: 'advocacy@phca.org'
Subject: [External] Long Term Care

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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 Mid-Valley Health Care. Our nursing facility is a 38 bed facility located in Peckville, Pennsylvania. We employ 50 employees and provide services to 38 residents. As DON, 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.

It has been challenging during this time to say the least. We have lost a few staff members during the pandemic and have not had any luck replacing them. We, as a facility, have run adds in the newspaper along with Facebook and Indeed. From those adds we have received 2 actual applicants, both of which did not accept the job offer. The health care market right now is very competitive and in a small facility like ours it is hard to compete.

Our small facility has a good reputation in the community and all of our staff work very hard for our residents. We strive for excellence in care. Through this trying time we have kept our residents safe and had only 2 of them test positive for COVID. Our current staff is caring and very effective.

I, as the DON, have been covering shifts, helping with admissions and patient care where needed. The staff is educated and competencies completed on hire, yearly, and as deemed necessary. We make sure all staff with direct care of residents is able to effectively, efficiently, and safely care for them.

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,
Deborah Reggie RN, DON
Mid-Valley Health Care

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