



From: [Cynthia Wolf](#)
To: [DH, LTCRegs](#)
Cc: advocacy@phca.org
Subject: [External] Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)
Date: Monday, August 2, 2021 12:41:59 PM

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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 of Hempfield Manor Our nursing facility is a 120 bed facility located in Greensburg/Westmoreland County, Pennsylvania. We employ 138 employees and provide services to 120 residents. As the Licensed 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.

I will share with you some of our concerns over this proposal.

First, there are challenges we anticipate which will impact our ability to reach a minimum of 4.1 staffing hours. For example, there currently limited workforce availability, funding challenges, agency staffing limitations and availability, competition with other local markets etc. In spite of the above fore-mentioned challenges, Hempfield Manor works diligently to recruit and retain qualified staff members to care for our 120 residents every day. Some of our strategies include; Social Media staff testimonial sharing, sign on bonuses, staff referral bonuses, staff appreciation luncheons and perfect attendance rewards.

Additionally, good care isn't necessarily related to greater numbers of staff. High quality care stems from qualified and competent staff members. Setting the staffing level too high may result in negative outcomes. There are limited staffing resources, and those resources should be utilized in an efficient and effective manner to ensure the health and safety of the residents we serve. Our current staffing is based upon the facility assessment and the components which include resident acuity, types of diagnoses, physical and cognitive disabilities, staff competency and physical plant design and layout.

Staffing needs are unique to each nursing facility. This proposal is not a one size fits all. Greater numbers of staff does not necessarily mean higher quality of care or better resident outcomes.

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;

Cynthia Wolf, NHA, MSN, BSN, RN

Administrator

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