



From: [Joyce Young](#)
To: [DH, LTCRegs](#)
Subject: [External] Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)
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Dear Sir/ Madam,

I am a RN who has seen both sides of staffing in a nursing home both as a nursing supervisor and as a mother, who's paralyzed forty-six year old son just passed away in a nursing home. When my son could not get help for twenty minutes to go to the bathroom and fell out of bed waiting, he asked me why he had to wait so long. I tried to explain to him that there was not enough staff on to help him. His comment to me was "This is not right Mom. Something needs to be done about this" (meaning the staffing situation).

Therefore, I am so glad to read that Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1) is aimed at doing something about the staffing problem that still exists in our nursing homes. This proposal is long overdue because the average nursing home patient acuity has increased, while the the direct care staffing to care for these individuals has not increased since 1999. This proposal would benefit both the staff and the residents. The benefits of higher staffing levels, especially RNs, include lower mortality rates; improved physical functioning; less antibiotic use; fewer pressure ulcers, catheterized residents, and urinary tract infections; lower hospitalization rates; and less weight loss and dehydration. In addition, there are less reports of resident abuse, when staffing is increased. Finally, with nursing staff increased, job satisfaction would increase, which would result in less call offs, less rehiring, and training, which would result in helping to keep the cost of rehiring down for the health facilities.

Many people will ask where the proposed added staffing is going to coming from. This could be solved by the state sponsoring nurse aide training classes for those who are unemployed. Other individuals might question where the funding is going to come from for the proposed added staff. This could be answered by studying funding plans of those states' that have already successfully increased their direct care hours in nursing homes.

I hope my comments and suggestions will be considered in support of this proposal. Please do not let our loved ones go without good nursing care because of the lack of staffing. By working together in supporting this proposal, we can help solve the problem of not having enough nursing staff in the nursing home facilities to protect and give our loved ones the good care that they need and deserve. Thank you.

Respectfully,

Joyce Young MSN, MHA, MPHE, EdD, RN