



## Retirement Community

August 12, 2021



Department of Health  
625 Forster St.  
Harrisburg, PA 17120

ATTN: Lori Gutierrez, Deputy Secretary  
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."

I am writing on behalf of the Residents and Direct Care Staff of the Pine Run Health Center located in Doylestown, PA. We have 90 licensed beds and employ 300+ Associates. As the Executive Director of Pine Run, a Continuing Care Retirement Community, I can attest to the dedication of our staff across the board to serve our Residents as they either age in place or transition to the next level of living.

We have significant concerns about this proposed regulation requiring the mandatory increase of the required minimum number of hours of general nursing care from 2.7 to 4.1 hours for each Resident while excluding other direct care provided by essential staff. Prior to the pandemic, we had significant staffing challenges and had to rely on agency nurses. Seventeen months into the pandemic, a significant number of our direct care and nursing staff have either retired or left healthcare completely.

At Pine Run, we budget our PPD at 4.1 and are only able to staff it to 3.5. We have increased and enhanced our recruitment and retention programs. We instituted flat bonuses for all direct care staff during the pandemic, *three* market adjustments, and a *flat \$5/hour adjustment* for our nurses. Despite all of these measures, we find ourselves once again relying on agency staffing. Achieving that 4.1 PPS is simply not within reach for any facility in today's healthcare employment climate.

We are committed to the wellbeing of the Residents we serve, their families, and our Associates. We want to be here in the years to come to continue serving our citizens. Please carefully consider the hardships and consequences of this proposed rule.

Sincerely,

A handwritten signature in black ink that reads "Maria Santangelo".

Maria Santangelo  
Executive Director

MS/mrl

Member of Doylestown Health