



**From:** [Karen Alizzi](#)  
**To:** [DH.LTCRegs](#)  
**Subject:** [External] Dept of Health Proposed Nursing Home Regulation Changes.  
**Date:** Tuesday, August 10, 2021 9:55:29 AM

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To: Lori Gutierrez, Deputy Director  
Office of Policy  
625 Forster Street  
Room 814  
Health and Welfare Building,  
Harrisburg, PA 17120  
RE: My comments in response to the proposed regulations.

Dear Deputy Gutierrez,

I've been a nursing home administrator since 2009. I'm a social worker by trade and love that my job gives me the opportunity to build relationships with older adults in my community. Everyone's goal is to provide the highest quality of care to our senior population. I have concerns about how the new regulations may actually make that much more difficult to accomplish.

1. Increase in PPD: While 2.7 is woefully inadequate, moving to 4.1 will be a challenge for many organizations. Pre COVID we struggled to find staffing and it's only become more of a desperate struggle since COVID. There is absolutely no way most facilities will be able to find enough staff to meet that PPD requirement. With all the job openings across all industries, the competition is fierce. Unfortunately most facilities don't have the additional funds needed to offer bonuses or increase salary rates to entice individuals to join the long term care workforce. Any increases to PPD must include increased funding sources to support this change. Using agency staff is expensive and doesn't guarantee quality care at all. An increase in PPD to the mid to upper 3s might be more manageable. And we should be able to include other essential staff in the PPD calculation. Staff that are providing care and services such as rehab therapy staff- the occupational therapist who are often assisting with ADLs as part of the therapy process or the speech therapist who is assisting a resident with eating.

2. Staffing challenges: As mentioned previously, we are struggling to find staff to fill our open positions. We are a Medicare and private pay community. But our census in our SNF has been very low which has greatly impacted our revenue. Hospitals are encouraged to send patients home. Patients are concerned about coming into the SNF environment due to COVID concerns. Without an adequate census we won't have the funds to continue to put more \$ toward our staffing issues. We are already using agency at an increased rate which has increased our expenses. And we can't increase census unless we have the staff to care for the residents/patients. Our struggles are real and we are desperate to find solutions. Financial penalties and a host of new regulations will only increase our financial burdens which may result in more facilities closing or greater increases to the daily rate for our private pay residents. Financial penalties are NOT the answer. We need to reduce the burden on facilities and residents, not increase it.
3. Proposed regulations in five parts: We must have adequate time to implement any new regulations. We are a small stand alone community. All of the burden of implementation of new regulations is on the DON and NHA. When our time is consumed with the implementation of extensive new regulations, we struggle to find time to manage the day to day at a level we expect. Lack of clarity to new regulations and guidelines is another huge consumer of our time. When new regulations are unclear or do not come with guidance, this leaves us with increased anxiety and investment in time to determine how to interpret and implement the regulations. However the new regulations are finalized, they must be completely transparent and provide leaders ample opportunity to implement.

Being a leader in long term care is completely exhausting. My colleagues and I have continued to be frustrated and disappointed by the impression the public has been given about our industry. There are MANY good facilities, desperately trying to continue to provide the highest quality of care they have been providing for years. No one seems to mention those facilities. We always hear about the facilities that are cutting staff and providing inadequate care and services. **Please** acknowledge the good facilities and focus your efforts on those subpar communities that need improvement. The burden of new regulations and financial penalties will only result in the good facilities having more challenges which will impact quality of care and potentially lead to closure. Is that what the state

government really wants? Good leaders are burning out and this is a travesty. We need good leaders in place so that we can provide the highest quality of care the PA State Government claims they desire for our seniors.

Respectfully,  
Karen

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