



From: [Scott D. Christie](#)
To: [DH, LTCRegs](#)
Cc: advocacy@phca.org
Subject: [External] Proposed staffing ratios in Skilled Nursing Facilities
Date: Thursday, August 12, 2021 1:28:16 PM

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August 12, 2021

Department of Health
625 Forster Street
Harrisburg, PA 17120
Attn: Lori Gutierrez, Deputy Director
Office of Policy

Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)

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 Sweden Valley Manor. Our nursing facility is a 121 bed facility located in Potter County in Coudersport, Pennsylvania. We employ 124 employees and provide services to approximately 100 residents. As the 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.

You are undoubtedly going to get a lot of these letters. I hope one you chose to actually read is this one

You can't go down the street where there are businesses and not see help wanted signs. Turn on the TV, pass a billboard, talk to a business manager and they all will show- there is not the work force applicants that we all need. Rather than get into the reasons for this (of which I have many) we need to realize that the folks who are applying generally do NOT want to do healthcare. It is absolutely unrealistic to think by mandating this that it shall be. There are days we struggle to meet minimums at 2.7 let alone 4 or higher. We staff higher every chance we can here. We promote a positive work environment and empower the

staff we have. We compete with quite a few healthcare industries though and this county only has 14,000 total people in it to begin with and MANY of them are retired.

“Forcing” a 4 or greater staffing ratio will cause the eventual closure of many homes and ultimately take away the services that many of the boomer generation will need. There just are NOT enough people to keep folks at home with home health. If this is the end game because it is cheaper for the insurance companies that seem to have somehow managed to drive the business then please reconsider that direction.

In addition to staff we cannot get Doctors to move here. We can't find physicians to take over Medical Directorships. We lose services in the area as hospital giants buy and downsize local hospitals and drive business to the cities leaving us basically Emergency services and Clinics.

You have to consider the domino effect of passing this bill. The consequences will be devastating and the people who will ultimately lose are the ownership and leadership that cares and replaced by giants who don't know their employees or residents and are only financially driven.

I offer this suggestion- Outlaw AGENCY STAFFING. The return of that staff would certainly help the situation out tremendously and increase the staffing levels almost overnight once they were dissolved.

Thank you for the consideration and please note that if you would like to discuss any or all of my points further I have included my personal cell phone number below.

Sincerely,

Scott Christie

Administrator

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Thank You.