



From: [Yali G](#)
To: [DH, LTCRegs](#); advocacy@phca.org
Subject: [External] Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)
Date: Friday, August 6, 2021 11:08:54 AM

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08-06-2021

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 who work at Centennial Healthcare and Rehabilitation. As the [Regional Director of Recruitment], I oversee 3 nursing homes operating across the Commonwealth. Collectively, these facilities are licensed for 150+beds, employ 50+ employees and serve 100+ residents. Our organization is committed to providing high quality care and prioritizing the needs of the residents we serve each and every day.

After reviewing your proposed regulation, we have concerns regarding the mandatory increase of the minimum number of hours of general nursing care from 2.7 to 4.1 hours for each resident, which excludes other direct care provided by essential caregivers.

As a direct ramification from Covid-19 we have experienced and are currently encountering staffing challenges that the world has never seen. We are doing our best to staff the building in the best way we possibly can however its practically impossible to onboard staff. The government is giving out free money preventing employees from have the desire to work. Facilities are offering crazy bonuses just to have people come in for an interview.

Agencies are offering an ostentatious rate to grab people so they can help the facility however this is all backfiring on the facilities ability to hire staff.

We are currently offering all the incentives we possibly can including tuition reimbursement,

sign up bonus, tuition reimbursement, shift differentials etc.

Increasing the minimum to 4.1 will definitely make things hard to reach and practically impossible. We provide fantastic care at our facilities we the current requirements of 2.7

Thank you for your time in reviewing and considering our comments. We are hopeful that the Department of Health will address our concerns and work with providers and staff to ensure continued access to long-term care services in Pennsylvania. We are hopeful that the Department of Health will amend the provisions contained in §211.12(i) in a manner that will address the concerns raised in our comments.

Sincerely,
Yael G