



**From:** [Garrett, Elizabeth](#)  
**To:** [DH, LTCRegs](#)  
**Subject:** [External] RE: Proposed nursing staffing ratios 4.1  
**Date:** Monday, August 9, 2021 5:03:47 PM  
**Attachments:** [image001.png](#)

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I didn't finish my one sentence.

**Elizabeth J. Garrett** | [Associate Director, NHA, MHA](#)

### Lutheran Senior Life Passavant Community

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**From:** Garrett, Elizabeth  
**Sent:** Monday, August 9, 2021 4:51 PM  
**To:** 'RA-DHLTCRegs@pa.gov' <[RA-DHLTCRegs@pa.gov](mailto:RA-DHLTCRegs@pa.gov)>  
**Subject:** Proposed nursing staffing ratios 4.1

This is my personal response to the updated nursing regulations which propose to set nursing ratio to 4.1 . I do believe our corporation will be sending in our corporate response.

My life as an Administrator is to develop a culture of person centered care where the resident isn't institutionalized but living having their voice be heard, so they direct their care and their personal lives be honored.

Would I love to have staffing ratio at 4.1. Yes! But in reality there are three factors that make the staffing ratio 4.1 not realistic:

1. Our culture doesn't value the certified nursing assistant. This is a physically challenging work. The hourly wage is low and the position is hard even if it starts at least 16.50 an hour which would make their yearly income 31,680. For a single person they would still need overtime.
2. No one wants to go into this position. We don't open our boards to other countries who

may take this position for others to come and be trained. We are incentivizing people to get unemployment instead of working especially through this pandemic.

3. The reimbursement for our residents isn't great. We work hard to ethically provide every ounce of care we give. Many residents themselves and families haven't saved enough to pay \$14,000 a month private pay. Government is promoting home care and in truth this will need to be monitored. We are a selfish culture and people behind their private doors give us 0 guarantee that the frail will have a better life with family taking care of them.

You can slap another regulation on us, but you need to look at the bigger picture. It isn't because we don't want to have staff we need to be able to pay for the staff. We will have the frail persons who age and they will need nursing support. The ratio used to be 6% of the population will need someone other than families to support them in their aging in a Community setting. It's easy to tell us what to do, again legislators need understand why it isn't 4:1 now.

Sincerely,

Elizabeth J. Garrett

**Elizabeth J. Garrett** | Associate Director, NHA, MHA

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