



**From:** [Naki Godfrey](#)  
**To:** [DH, LTCRegs](#)  
**Cc:** ["advocacy@phca.org"](mailto:advocacy@phca.org)  
**Subject:** [External] Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)  
**Date:** Monday, August 9, 2021 9:51:48 AM

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August 9, 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 for nursing homes managed by Complete HealthCare Resources. As the Vice President of Sales and Training, I support 10 nursing homes operating across the Commonwealth. Collectively, these facilities are licensed for approximately 1700 beds, employ approximately 1500 employees and serve approximately 1200 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.

The availability of workforce in the areas we serve is minimal and even though we spend time and resources on recruitment efforts, we have had a difficult time recruiting staff, even with incentive programs in place. We barely have the staff, operating minimally at a 2.7, to care for our current resident population. There are other essential care workers in our communities such as physical therapists, speech therapists, occupational therapists, dietitians, wound care nurses and activity directors whose hours should be included in the state's staffing minimums as they are essential to the care of our residents and part of the interdisciplinary team providing care and services each and every day.

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,

Naki Godfrey

Naki Godfrey  
Vice President, Sales/Training

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