



From: [Samantha Jones](#)
To: [DH, LTCRegs](#)
Cc: [advocacy@phca.org](#)
Subject: [External] Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)
Date: Tuesday, August 10, 2021 1:41:46 PM

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8-10-21

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 that I serve as a Social Worker residing in Quality Life Services - Sarver. As a healthcare worker, I am committed to providing high quality care to our residents and building a culture in the facility that values and respects 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.

As a social worker and admissions director, I play a part in every aspect of the residents journey through the facility from bringing them through our doors to ensuring appropriate assessment, social and emotional well-being, to discharge planning and ensuring that we are doing everything in our power to safely discharge that resident to their previous living situation to help prevent future hospitalizations. I am on the floor daily welcoming in new residents, meeting with current residents, assessing, and discharge planning. I meet one on one with the resident and their families to resolve any

concerns they may have and ensure that their loved ones needs are met at the appropriate level. It is a responsibility I take very seriously, and is an important aspect of care now more than ever as we continue to work through the COVID19 pandemic. Having social services in place rounds off the holistic

approach as my role is not solely focused on just medical nor psychological needs. Both of these are imperative to the residents well-being and one must work in conjunction with the other. Any stay in a skilled nursing facility, be it long or short term, is a disruption to the resident's life, and my

role provides that needed support to make the transition to and from as seamless as possible for the resident and their family. My presence ensures the resident that they have an unbiased advocate in their corner.

I respectfully recommend that any increase in the minimum requirement regarding direct care hours provided to a resident include the hours of direct care I provide as a Social Worker in the nursing facility. The services I provide are just as important to the resident's well-being, quality of care and quality

of life as the services provided by RNs, LPNs and CNAs.

Thank you for your time in reviewing and considering our comments. 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,

Samantha Jones

Customer Experience Director - Social Worker

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