



# Providence Place

## SENIOR LIVING



August 3, 2021

Department of Health  
625 Forster St,  
Harrisburg, PA 17120  
Attn: Lori Gutierrez, Deputy Secretary  
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".

We have grave concerns regarding the amendments of the regulation to increase the required minimum number of hours of general nursing care from 2.7 to 4.1 hours of direct resident care for each resident residing in a nursing facility

I understand and support the goal of increasing the staffing levels at skilled nursing facilities, but I see two serious problems with this proposed rule:

1. **The timing is terrible!** Everyone in the health care field is desperately seeking nurses and caregivers. It is currently very difficult to ensure adequate staffing, let alone increases to higher levels of staffing. Please delay this rule's implementation until at least mid-2022.
2. **Skilled nursing facilities can't possibly afford** the cost of this increase in staffing without significant financial assistance. Substantial ongoing financial assistance must be provided to permit this change.

Incidentally, I felt forced to leave the skilled nursing field because the MA reimbursement made it impossible to provide the staffing I believed was needed. Medicaid patients' care continues to be drastically underfunded and this new rule would make it even worse!

This letter is being sent on behalf of the residents, nurses and direct care staff of Providence Place Senior Living's seven PA assisted living residences and personal care homes. In PA we employ more than 600 persons, the majority of whom are full-time. Our communities serve more than 700 senior residents at our locations in Lancaster, Collegeville, Chambersburg, Hazleton, Pottsville, Pine Grove, and Dover.

Thank you for your time in reviewing and considering these 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,

David Leader  
President and CEO

1528 Sand Hill Road | Hummelstown, PA 17036 | 717.520.0330

Collegeville  
4000 Ridge Pike  
Collegeville, PA 19426

Chambersburg  
2085 Wayne Road  
Chambersburg, PA 17202

Pottsville  
2200 1st Avenue  
Pottsville, PA 17901

Drums (Hazleton)  
149 S Hunter Highway  
Drums, PA 18222

Dover (York)  
3377 Fox Run Road  
Dover, PA 17315

Pine Grove  
24 Hikes Hollow Road  
Pine Grove, PA 17963