



**From:** [Natalie McKay](#)  
**To:** [DH, LTCRegs](#)  
**Cc:** [Keith E. Frndak](#); [Brian Hortert](#)  
**Subject:** [External] Comments on proposed staffing changes for skilled nursing facilities  
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Lori Gutierrez  
Deputy Director, Office of Policy  
625 Forster Street, Room 814  
Health and Welfare Building  
Harrisburg, PA 17120

Dear Ms. Gutierrez,

I am writing to express my deep concern over the proposed staffing changes for Skilled Nursing Facilities in Pennsylvania to increase the minimum staffing requirement from 2.7 hours per patient per day to 4.1. As I am sure you can imagine, the last 18 months has been nothing short of a nightmare for skilled nursing facilities. For background, I have been a licensed Nursing Home Administrator since 2004, and the NHA for Concordia Lutheran Health and Human Care in Cabot, PA for the last 10 years. I will do my best to leave Covid out of my comments and focus on the current staffing challenges that we face as an industry struggling to care for our seniors.

Our jobs in Nursing Homes are physically and emotionally demanding. Our residents require care 24:7:365 which means our caregivers must work weekends, holidays, and less desirable off shifts. We have continued to increase wages and offer bonuses in order to stay competitive but while non-healthcare employers can offer less demanding jobs or schedules are paying similar wages and bonuses to attract workers. Additionally, our nurses and aides are experiencing burn out and leaving the healthcare profession in record numbers at a time when their skills are needed most.

Approximately 50% of the residents of my facility are paid by Medical Assistance. If you are not aware, we have not had an increase in reimbursement by the Pennsylvania Medical Assistance program in five years while we have experienced increased costs in every aspect of our operations – supplies, wages, health insurance, etc. I am sure you can see the problem here – we simply cannot continue to increase wages exponentially to survive in 2021 and beyond while operating on 2016 reimbursement.

I am fortunate to work for an organization that has a strong history and reputation in the community as a quality provider of care; however, that does not mean that we have not faced the same challenges as other facilities. Nursing Homes have been vilified in the media and are no longer an attractive work setting for nurses or aides, who would rather work in hospitals that can offer significant bonuses and higher wages due to higher reimbursement. Additionally, the restrictions and requirements for Nursing Homes have been far more restrictive than those for acute care

employment settings, further adding to the undesirability of our work setting.

We take care of the most special, precious, and deserving citizens of Pennsylvania. The older adults for whom we care deserve the absolute best time, care, and attention we can offer; however, increasing the minimum staffing requirement from 2.7 hours per patient per day to 4.1 will not achieve this. We would rather focus on training, supporting, and retaining our dedicated teams of caregivers than to focus on quantity of hours in order to meet this increased requirement. I anticipate that some nursing homes will find themselves in a situation where they must close their doors and cease operation because they cannot continue to operate under these conditions and requirements.

I would welcome the opportunity to further discuss this critical situation. Please feel free to respond to this email or contact me on my cell phone below should you have any questions or need for additional details.

Most sincerely,

Natalie McKay

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