



8/10/2021

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 of Laurel Ridge Center. Our nursing facility is a 61 bed facility located in Uniontown, Pennsylvania. We employ approximately 70 employees and provide services to 61 residents. As the Director of Nursing, I can attest to our facilities commitment to providing high quality care and prioritizing the needs of the residents we serve each and every day.

After reviewing the proposed regulation, we have 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 director of nursing, I do not support this proposed rule. Currently, we have many staffing challenges and it is difficult to hire and retain employees. An increase in requirement for staffing up to 4.1 would compound these challenges greatly. We have sign-on bonuses, retention bonuses, extra shift pick-up bonuses, and other incentives for staff. It is still difficult to maintain the current staffing pattern especially post COVID-19 pandemic. It would be nearly impossible to meet a minimal of 4.1 hours due to the shortage of working healthcare workers and the financial hardships that most facilities have already faced due to the pandemic.

Thank you for your time in reviewing and considering our comments. We are hopeful that the Department will amend the provisions contained in §211.12(i) in a manner that will address the concerns raised in our comments.

Sincerely,

Alma Pechatsko RN BSN