



Stephen Hoffman

From: James D. Moate <jmoate@cameroncountypa.com>
Sent: Thursday, August 19, 2021 9:29 AM
To: IRRRC; RA-DHLTCRegs@pa.gov; klrapp; Frankel Dan B.; mbrooks@pasen.gov; Haywood, Art
Subject: Rulemakings 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)

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Good morning.

Please let me first tell you that Cameron County, the smallest county in the Commonwealth, does not have a county-owned and operated nursing home facility for a number of reasons (not the least of which that it would be an extreme financial burden to our ever-shrinking tax base.) That being said, let me take off my commissioner hat for a minute and slip on my hat as a board member for the one and only privately-funded long-term care facility in the county.

It is my firm belief that raising the minimum number of direct resident care hours from 2.7 to 4.1 very well could cost the smaller long-term care facilities within the Commonwealth to close their doors indefinitely. As you may well know, many employers across the state have been really struggling to hire and retain employees in the wake of the pandemic and the increase in unemployment benefits. I assure you, Cameron County is no different.

You should know that I do not wholly disagree that there should be minimums that are met. However, I feel that the proposed increase is far too great to sustain for these smaller facilities without a restructuring of the metrics used to determine what is considered "resident care hours." As it stands, there are many types of intervention taking place that are not considered "resident care hours" which still contribute to the residents' health and well-being. I'm referring to doctor visits, family visits, structured activities, etc. It is my opinion that the Commonwealth should be willing to compromise a bit.

I would recommend either:

- a.) lowering the proposed minimum (perhaps to 3.0 resident care hours per shift,) and/or
- b.) redefining what is considered "resident care hours" to include other activities that still affect the residents in a positive way

I would also recommend reaching out to some of the administrators of these smaller facilities within the Commonwealth for their input before making such a drastic decision. I think you will find their feedback invaluable and they will greatly appreciate being involved in the decision-making process.

Best regards,

James D. Moate

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"The secret of change is to focus all of your energy not on fighting the old, but on building the new." Socrates



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