



**From:** [Karen Beilstein](#)  
**To:** [DH, LTCRegs](#)  
**Cc:** [Brian Hortert](#); [Keith E. Frndak](#)  
**Subject:** [External] Comments on proposed staffing changes for skilled nursing facilities  
**Date:** Tuesday, August 17, 2021 5:31:16 PM

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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. The last 18 months have been extremely trying for skilled nursing facilities and their employees. I have worked in long term care since 2001 and am currently an Administrator in Training at Concordia Lutheran Health in Human Care in Cabot, PA. I fear the proposed change in staffing will have devastating consequences. Please allow me to elaborate below.

Unfortunately, due to unemployment and overall burn out from COVID the staffing crisis is a true crisis in almost every industry. For many of our local competitor skilled nursing facilities we hear they are struggling to staff their buildings at the current minimum of 2.7 hours per patient day. We have heard of more than one competitor who is holding bringing in new admissions due to staffing woes which will ultimately compound financial issues. My fear is once the minimum threshold is increased to 4.1 these local competitors may no longer be able to continue providing services, leading to a closure of their facility. The elderly population continues to grow and require our care, who will be left to care for them?

At my facility we still remain fortunate in being able to maintain a staffing ratio much above state minimum. I consider myself blessed to work for an organization that has a strong history and reputation in the community as a quality provider of care.

However, we are not immune to the staffing headaches. We have increased sign-on bonuses, wages and evaluated more desirable self-scheduling for nursing staff members in order to remain an attractive employer.

The proposal for increased staffing could not come at a worse time. Baby boomer nurses are retiring and the pipeline of new nurses has been stagnant. There are local nursing schools who are unable to staff the nursing professors, therefore dramatically delaying their student's graduation dates—at the time when we need them the most. The fear of working in COVID has led to some health care staff members burning out

and leaving the nursing profession. All of these situations combined leads to a quandary of how these proposal could allow any skilled nursing facility to survive pre, mid and post pandemic.

Everyday there are many staff members who provide an impact on the residents' day in some way of providing assistance with their activities of daily living care, feeding, toileting, participating in meaningful activities and connecting with loved ones. Many of these staff members that make a true impact on the patient are not currently included in the calculation for PPD.

Other financial restraints that compound our service line is fixed reimbursement. At our facility, approximately 50% of the residents are paid by Medical Assistance. We have not had an increase in reimbursement by the Pennsylvania Medical Assistance program in five years while we have continued to experience increased costs in every aspect of our operations – supplies, wages, health insurance, etc. Unfortunately, the math equation will not work as we cannot continue to increase wages, bonuses and stay incentives to survive while operating on 2016 reimbursement.

Increasing the minimum staffing requirement from 2.7 hours per patient per day to 4.1 will not achieve an increase in quality of care. In fact, it is highly likely to cause detriments to the precious elderly citizens of Pennsylvania that we are honored to provide care for every day. Instead, the areas that could be enhanced would be promoting of health care jobs in a positive light, continuing the temporary CNA program, focusing on ways to increase nursing school students and additional support with training in the ever changing regulatory and guidance world that we live in today.

I welcome the opportunity to further discuss this critical situation. Please feel free to respond to this email or contact me directly at 724-352-1571 ext 8399 should you have any questions or need for additional details.

Most sincerely,

Karen Beilstein

*Karen Beilstein RN, BSN, MHA*

**Administrator-In-Training**

**Concordia Lutheran Ministries**

**134 Marwood Rd**

**Cabot, PA 16023**

**724-352-1571 ext 8399**



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