



From: [Lisa Defibaugh](#)
To: [DH, LTCRegs](#)
Subject: [External] DOH Proposed Nursing Home Regulations
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Attachments: [image001.png](#)
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Deputy Gutierrez,

In response to the proposed regulations, I would like to comment that though I do agree that the current 2.7 staffing level for nursing homes is no longer appropriate given the higher acuity of the population we serve today, I am very concerned that the workforce needed in our nursing homes does not exist under the current reimbursement model. Workers are leaving nursing homes at a high rate to work in equal or higher paying jobs outside of health care. I would support a higher staffing ratio and admit it will benefit residents and staff however it must be combined with an increased payment model that can be passed on to staff wages to attract and retain workers.

My nursing home already staffs at the higher PPD however we lose \$154.35 per resident per day on all Medicaid residents and will not be able to sustain this into the future. Nursing home workers fulfill a VERY important role in our society and they should be paid accordingly. Please help us fix senior care in our country and promote a solutions for staff and residents.

I appreciate your consideration.

Lisa Defibaugh

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