



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 Williamsport South Rehabilitation & Nursing Center. Our nursing facility is a 116 bed facility located in Lycoming County, Williamsport, Pennsylvania. We employ approximately 110 employees and provide services to 85 residents. As the Administrator, 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 grave 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 skilled nursing facility, we already face challenges regarding workforce availability, funding challenges, and agency staffing concerns. We are taking all steps possible to address each and every one of these challenges. We have a variety of recruitment strategies including referral bonuses, sign-on bonuses, increases, and covering the costs of certifications. An increase in the minimum requirements will only compound these challenges that we are fighting every day already.

Williamsport South Rehabilitation & Nursing Center provides a lot of direct care that is not currently included in the minimum requirements because it is not considered general nursing even though it has a very big impact on our resident's physical, mental, and social well-being. These services include physical therapists, occupational therapists, speech therapists, dieticians, wound care nurses, activities directors, and social services directors.

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,  
Kelsey Ecker, NHA

A handwritten signature in black ink that reads "Kelsey Ecker, NHA". The signature is written in a cursive style.