



2230 Cedar Street  
Hollidaysburg, Pa 16648

August 13, 2021

Lori Gutierrez  
Deputy Director, Office of Policy  
625 Forster Street, Room 814  
Health and Welfare Building  
Harrisburg, PA 17120

Dear Ms. Gutierrez,

As a non-profit social services agency board member, I am writing to you out of concern about the first portion of the proposal to update Pennsylvania's nursing facility regulations as published in the Pennsylvania Bulletin. I am referring specifically to the DOH regulation seeking to increase NHPPD from 2.7 to 4.1 on each shift.

As the owner of a marketing firm, I can attest to our clients' desperation and preoccupation in trying to effectively advertise for new employees. This has become a crisis situation across the board for our client base, which is a diverse group of retail stores, manufacturers, restaurants, and service providers. I know the situation is even worse in nursing facilities. The COVID 19 pandemic has intensified the already existing and now astounding lack of job applicants. Sign - on bonuses, salary increases and other means of attracting workers are not making a dent in a vastly shrunken and shockingly sparse labor pool. In addition, the expense for all of this recruitment marketing puts undue stress on already tenuous budgets. I consider myself to "be in the field", and I see this every day.

Advertised benefits seem to have little if no effect in attracting job applicants, let alone qualified ones. In serving as a board member for a dynamic social services organization, which includes ownership and operation of nursing facilities that provide long - term care, I can attest to the organization's inability to find and retain qualified nursing staff. Human Resource reports at our board meetings detail accounts of an unbelievably dire labor market and the inability to find nursing staff. I know that this holds true for all other long - term care facilities, too, as the market is saturated with recruitment billboards, electronic media and print ads.

In addition, we must ask ourselves if merely increasing the number of nursing staff really means quality of care will improve? Isn't the quality of care determined by the makeup of the "team" on duty, including therapists and others who contribute to a patient's wellbeing?

This proposed regulation, coupled with woeful underfunding and little advance warning as to when this new NHPPD regulation might go into effect, might well cripple the ability of already struggling long -term nursing facilities to remain viable, especially in such unprecedented times.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne Egan Glenn". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Suzanne Egan Glenn