



WESTMINSTER WOODS AT HUNTINGDON

a PRESBYTERIAN SENIOR LIVING community



August 19, 2021

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

Dear Lori Gutierrez,

My name is Chad Evans and I am the Executive Director at Westminster Woods, A Continuing Care Retirement Community in Huntingdon Pennsylvania. On July 31, 2021, the Department of Health published, in the Pennsylvania Bulletin, a proposed regulation to require nursing homes to increase the requirements for staff from a 2.7 Nursing Hours Per Patient Day (NHPPD) to a 4.1 NHPPD.

I am writing to ask that you oppose this change to the NHPPD regulation. I have been a licensed Nursing Home Administrator in Pennsylvania since November, 1997. From my perspective, these proposed changes would have a dramatic negative impact on the seniors living in the nursing homes of Pennsylvania in the following ways:

- An indiscriminate increase in the NHPPD does not necessarily equate to improved quality of care. Instead, the Commonwealth should consider an NHPPD based on acuity to allow for the differences between the types of residents each nursing home serves.
- Presently, we are in the midst of an unprecedented staffing crisis, not just in Long Term Care, but in the labor force in general. At Westminster Woods, we are having a very difficult time finding people who want to work in this environment given the challenges we face with COVID-19. It would be unfair and irresponsible to support an increase to the NHPPD at this time. Instead, consider eliminating the benefits that incentivize people to remain unemployed.
- There are more creative ways that should be explored to help with staffing vs. a random increase in NHPPD, including allowing Therapists, Life Enrichment Staff and Medication Techs to support in caregiving. The Federal Government has chosen not to mandate a minimum NHPPD, in part, because they did not want to stifle innovation.
- Nursing Facilities are already underfunded and have not seen a Medical Assistance Rate increase in seven years.
- Due to the nature of the uncertain timing of when the regulation will be effective, nursing facilities would essentially have no time to prepare, there should be a significant lead time to allow facilities to ramp up.
- A 4.1 NHPPD is significantly higher than other surrounding state minimum NHPPDs: West VA 2.25 NHPPD, Ohio and New Jersey 2.5 NHPPD, Maryland 3.0 NHPPD, Delaware 3.67 NHPPD, New York does not have a minimum but states sufficient staffing is required.
- A 4.1 NHPPD will have a negative impact on seniors in that providers could be forced to go out of business essentially providing less choice and services.

No one could argue that our seniors deserve to be given the utmost care and protection. However, I feel an increase in the NHPPD of this increment will do more harm than the good that was intended. Thank you for your time and consideration.

Sincerely,

Chad Evans
Executive Director
Westminster Woods