



From: [Paula Felton-Werner](#)
To: [DH, LTCRegs](#)
Subject: [External] Proposed Nursing Facility Regulations regarding staff hours increase
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Attachments: [image001.png](#)

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To Whom It May,

Wanted to reach out regarding the proposal to increase the nursing home staffing requirement from 2.7 to 4.1 NHPPD on each shift. As a long tenured operator, this proposal is very concerning. I am sure I speak for every provider we do not need a new regulation to mandate staffing levels, we need support!

First, I am asking to consider the federal government's approach to allowing the facility assessment and resident care plans determine appropriate staffing instead of 4.1 NHPPD, which does not necessarily equate to quality of care. We are in a staffing crisis and there is a disconnect of what the front line is experiencing and this mandatory will only worsen the crisis.

Our clinical team, LPN, RN and CNA's, are not the only staff that provide care to our residents. Our therapist, activities team and others provide care and services that add to the overall wellbeing of residents. Would ask consideration modify your proposal to include other staff that provide care and services to our residents. For example, our speech therapist supports our residents while our residents eat when they are evaluating their swallowing.

Secondly, we ask consideration to utilize Med Techs, we need to expand our abilities to meet the needs of our residents. Currently, we have some residents requiring 15, 20, 25 different medications in a daily and this is unmanageable if we don't have LPN's to provide the necessary medication.

Third, the financial burden this places upon our facility. We are significantly underfunded and have not seen a Medical Assistance (MA) rate increase in seven years. I am very concerned with the cost of this proposal, even if the

Department of Human Services includes the average salary costs, as this will miss the costs to recruit and the cost of benefits.

Lastly, we all want more staff! We need your support and understanding of what we deal with day in and day out. Our front line teams cannot continue to sustain the significant regulations and we don't have the resources to pay them. We ask for your support, and creating new regulations for unrealistic and creates additional burdens which will force operator like us to go out of business.

Best regards,

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