

RECEIVED

Aug 20 2021

Independent Regulatory
Review Commission

August 16, 2021

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

Ms. Gutierrez,

As a Board Member of Saint John XXIII Home, Hermitage, PA and a 15-year Level 2 LTC Ombudsman, I am very concerned with the proposal of an increase to 4.1 NHPPD.

To keep the high-quality staff that Saint John XXIII is known for it would be quite a challenge to quickly fill a high number of positions along with developing adequate training curriculum for the above policy requirement. Would these curriculums call for current staff members to dedicate an inordinate amount of time and effort perhaps even work over time if tasked with developing these curriculums and/or teaching it?

Where would all the newly qualified personnel come from especially in a time crunch? Saint John XXIII does not want to dilute its personnel ranks with inadequately trained staff members. Hiring a large number of personnel would be a huge project to publicize vacancies, interview, train, and get new staff members up to speed...the lag period could impact on patient care routines.

Funding also seems fraught with several questions...for example: funds would come from what source, how often, how would they be fairly distributed amongst facilities, what would be criteria for the funds, would there be caveats attached to the funds, and how quickly would each facility receive the funds?

It would be interesting to know what type evaluation and accountability procedures each facility would be required to do after fund receipt and implementation.

As a Board Member and sincere advocate for senior care, I cannot agree with an increase in NHPPD to 4.1 as being needed at this time without more involvement and research from those actually in the profession.

A team of LTC administrators, DON, RN, LPN, STNA/ CNA, NA, PT, Activity Specialists, and all involved with NHPPD care with their input, concerns, and ideas for daily patient care hours would be needed as the initial investigation regarding the feasibility of the above policy.

Sincerely,
Rosemarie Janosko
75 Stone Ridge Blvd.
Hermitage PA, 16148
rjanosko@roadrunner.com