



## Maplewood Nursing & Rehabilitation Center

A Bedrock Care Facility

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 Maplewood Nursing and Rehabilitation. Our nursing facility is a 180-bed facility located in Philadelphia, Pennsylvania. We employ 165 employees and provide services to 140 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.

I am not supportive of raising the minimum direct general nursing care hours to 4.1 as due to the many challenges currently faced by long term facilities in this staffing marketplace. Since the Covid-19 pandemic began our facilities have been faced with dire competition with being able to recruit and retain staff, as we have not been able to obtain or keep the staff necessary to best care for our residents. We must also look at whether other disciplines should also be taken into consideration when factoring the staffing minimums.

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,

A handwritten signature in black ink that reads "Dianna Mastropietro".

Dianna Mastropietro, RNHA  
Maplewood Nursing and Rehabilitation