



From: [Sandy & Lou Nicoletti](#)
To: [DH, LTCRegs](#)
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Subject: [External] Proposed regulation NHPPD
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Lori Gutierrez, Deputy Director
Pa Department of Health
Office of Policy

Ms. Gutierrez;

My name is Louis Nicoletti. I am a long-standing member and current treasurer of the Board of Directors at Arbutus Park Manor (APM), a four (4) star non-profit (§501-C3) nursing home facility, located in Johnstown, Pa.

I am writing to respectfully express my concern with the Department of Health's (DOH) proposal to increase the care ratio from 2.7 to 4.1 nursing hours per patient day.

I fully agree with the DOH's intention to improve the quality of care. I firmly believe we all should continually seek paths to improve quality of care. However, the proposed increase in the care ratio could be counter productive, in addition to placing an undue and undeserving hardship on APM. I offer the following to support this statement:

* APM is already experiencing a staffing crisis at the current care ratio level, an industry wide phenomena. An increase in the ratio would only exasperate this crisis.

* To comply with an increased care ratio could place APM in a position to limit admissions thus reducing its census. Needless to say, a reduced census results in reduced revenue. APM is already financially struggling from the wake of the COVID pandemic, often times reaching into its rainy day fund to meet current obligations. Any reduction in revenue would be severely felt.

* A reduction in the revenue stream could place APM in a position to look even deeper, than it has been, at reducing expenses by cutting ancillary staff that "indirectly" contribute to the quality of care that has historically been provided at APM. This would merely defeat the DOH's motive of raising the ratio.

Based on the aforementioned points (more can be offered upon request), I petition the DOH to reconsider its well intended proposal to increase the ratio of nursing hours to patient days.

Thank you for your consideration.

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Sent from my iPad