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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 Ronald Reinbold. I am the president of the Board of Directors at Arbutus Park Manor, a four star non-profit nursing home facility located in Johnstown, Pa.

As president, I wish to comment on the Department of Health's Proposed Nursing Regulations. To start, I believe that the Department of Health has improving nursing care in the state as a top priority. The Board of Directors, administration, staff and volunteers also work daily to provide a caring, safe and faith-based experience for all of our residents who call Arbutus home. We always strive for ways to improve. However, I must react to aspects of the proposed regulations which I believe will undercut the notion of improving care to our residents.

Of most concern is the mandate to increase staff contact hours per patient from 2.7 to 4.1. On the surface this aspect is commendable. However, this level of contact is unachievable today and into the foreseeable future at Arbutus and other nursing facilities. The "We are hiring" signs are present locally, regionally and nationally. They are going for the most part unheeded. Increasing hourly rates, improving benefits and giving bonuses have yielded few hirings. An increase in staffing is sorely needed to make this mandate workable. I can not imagine our staff being expected to move from 2.7 contact hours per patient to 4.1. These dedicated individuals are exhausted, but they carry on because they are determined to provide a caring and safe environment for their patients. Our four star rating is their badge of honor.

Moreover, Arbutus has suffered revenue losses because we can not care for additional patients without additional staffing. Under the present system, we are limited to one hundred patients although we have beds for one hundred forty-one. Maintaining these unused units is costly. Recently we have explored selling twenty of these beds to another nursing facility in order to cut costs and raise needed funds. We put the twenty beds out for bids and received only one bid. The Board of Directors is presently deciding whether to accept the bid or decline it. In addition, governmental support has been unreliable, if not nonexistent. Nursing facilities have been underfunded for years and increases in medical assistance rates have not fared much better. Raising private pay rates is risky. We must remain competitive with other nursing homes or we will lose patients. And the more we raise these rates the faster their financial reserves are diminished.

In summary, by moving from 2.1 to 4.1 hours will undermine the quality of care provided to our patients. We do not have the staff or necessary funds to implement this aspect of the new regulations. If these regulations are implemented, please introduce them over a period years. We will need time to increase staff and solve financial concerns. Together, we can improve the quality of care given to patients.

Respectfully submitted,
Ronald G. Reinbold

