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To: [DH, LTCRegs](#)
Subject: [External] Proposed Nursing Facility Regulations
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I would like to go on record concerning some of the regulations being proposed:

Changes in Staffing Requirements:

Increasing the nursing hours from 2.7 to 4.1 per shift certainly will not improve quality. To the contrary especially since so many of our health care providers have been and are being burned out from the COVID pandemic. Adding more hours to a shift would be detrimental to the care given. In addition, there is a staffing crisis - perhaps the worst we've seen for a very long time.

My question is - when will this regulation take effect? Have Nursing Facilities been given a heads up and time to ramp up to meet the new requirement? Especially in the day in which we are living and the challenge there is in hiring, Nursing homes should have at least a year to comply.

MA facilities are already significantly underfunded and have not seen a MA increase in seven years. This will be a very costly proposal to all - facilities as well as individuals alike.

Nursing facilities have been closing beds due to deterioration of access to quality care. Abramson Center has been sold and Charles Morris has closed its doors.

There is the potential for citations and potential fines from both State and Federal Government for the same issue.

Let's not put this regulation into effect until every piece of the regulation has been thoroughly researched and thought given to the impact it could have on many, many facilities.

Our health care providers need our support especially at this time and not any new regulations thrown into the mix to discourage them and cause them to perhaps leave a profession many love.

Thank you so much for thinking this through and not jumping the gun.

E. J. Rittersbach