



Health &
Rehabilitation
Center



August 19, 2021

Lori Gutierrez

Deputy Director, Office of Policy

625 Forster Street, Room 814

Health and Welfare Building

Harrisburg, PA 17120

Dear Ms. Gutierrez,

I have reviewed the recently published proposal to update nursing facility regulations, specifically, the proposed regulation to increase Nursing Hours Per Patient Day (NHPPD) from its current 2.7 NHPPD to 4.1 NHPPD.

As a current Nursing Home Administrator, and a Registered Nurse, I am writing to express my concerns about this proposed regulatory change and any addition unknown regulatory changes.

I believe that all facilities should base NHPPD on resident care needs and staff experience. Facilities should consider the needs of the residents based on a combination of the Minimum Data Set (MDS) indicators, resident specific care plans and staff interviews. I also believe that therapy staff and recreational staff hours should be included in the NHPPD, as they provide care that promotes the resident's overall health and wellness.

We are fortunate to have a high number of tenured staff and we have an excellent reputation in the communities in which we serve. As both an administrator and a registered nurse, I take great pride in the care provided to our residents and truly believe

we enhance our residents lives on a daily basis. Our organization has worked tirelessly to recruit and retain staff throughout the Public Health Emergency (PHE). Despite our efforts, our facility like so many others, is unable to recruit qualified staff.

LGAR Health and Rehabilitation Center's mission is to serve our community, therefore our resident payer mix is predominately long term Medical Assistance (MA). Nursing facilities are significantly underfunded and have not seen a MA rate increase in seven years. The cost burden of increasing NHPPD to 4.1 will likely make nonprofit facilities such as ours nonexistent.

I ask that you suspend this regulatory proposal and allow our nursing home leaders and department of health employees to put their energy into working through the remainder of this PHE and continuing to give our elderly, most vulnerable population their best lives possible.

I can be reached for clarification or further dialogue at 412 825-9000.

Sincerely,

A handwritten signature in black ink that reads "Mary Staller MSN, RN, NHA". The signature is written in a cursive style.

Mary Staller MSN, RN, NHA

Administrator, LGAR Health and Rehabilitation Center