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To: [DH, LTCRegs](#)
Cc: [advocacy@phca.org](#); [Harris, Craig](#)
Subject: [External] Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)
Date: Monday, August 16, 2021 4:11:26 PM

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August 16, 2021

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 Genesis Quakertown Center. Our nursing facility is a 138 bed facility located in Bucks County, Quakertown, Pennsylvania. We employ approximately 130 employees and provide services to 109 residents. As the Regional Executive Director, 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. We personally have been experiencing many staffing challenges. With workforce availability, funding challenges, agency staffing issues, and competition with other workforce markets staffing our building has been an uphill

battle. We have been working diligently with recruitment and working towards retention of our own employees. Meetings are held monthly to address retention to improve overall staffing morale. We attempt to have positive activities weekly for the staff. We also have been working with corporate to develop incentive programs. Increasing staffing levels to reach a minimum of 401 hours of general nursing care would be impossible. Most days it is a struggle to staff at 2.7 hours. Many caregivers working in facilities are providing daily, direct care to residents that are unaccounted for in Pennsylvania's staffing requirement. It is the responsibility of all employees no matter what department to ensure the needs of the residents are addressed. This includes dietary, activities and administration. Setting a staffing minimum too high will not guarantee improved care – it may result in unintended negative outcomes. There are limited staffing resources and those resources should be utilized in an efficient and effective manner to ensure the health and safety of the residents you serve.

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,

Debra Stoneback | Regional Executive Director

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