



From: [Donald Aldrich](#)
To: [DH, LTCRegs](#)
Subject: [External] Comments on 7/31 DOH Update of Nursing Facility Regulations
Date: Saturday, August 21, 2021 2:16:00 PM

***ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.*

As a citizen of the Commonwealth of Pennsylvania, I am submitting me personal comments on the proposal of July 31,2021 by the DOH to update nursing facility regulations. I am **strongly opposed** to the proposed regulation to require nursing facilities to increase staff from 2.7 to 4.1 nursing hours per patient day. I believe it is not the proper role of good government to define staffing level requirements at such a high level. Yes, government can define minimum quality of care required, but defining staffing levels does not equal quality of care. You must leave it up to indivual decisions of administrators as to what level of care, at or above the minimum, they choose to offer and to the individual resident and their family as to what facility they wish to use and what level of cost they can assume. This is simple economics in a free country. Please do not disturb this balance.

Implementation of this proposal will potentially have devastating impact on me and most private citizens. It will greatly increase costs, which will have to be passed on the those who use nursing facilities, it will also stifle creativity to give excellent care in progressive facilities who seek better ways of caring without increasing cost. As you know, Medical Assistance rates have not been increased by the Commonwealth for at least seven years. Nursing facilities have already closed and others have been sold to large, impersonal, out-of-state providers some of whom have records of providing bad care. The subject proposal will only serve to cause more nursing facilities to be another statistic in this trend. You are also aware of the current critical workforce crisis - this proposal would bring chaos to this industry. Certainly, we here in PA can do better than that. Certainly, you can perform a helpful role as the DOH without so drastically negatively impacting care and costs.

Please rethink these proposals and withdraw them.

Thank you for your consideration,

Dr. Donald Aldrich
New Holland, PA