



**CITY OF PHILADELPHIA**  
**CITY COUNCIL**

Kendra Brooks  
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Councilmember At-Large

August 20, 2021

Sent via email to [RA-DHLTCRegs@pa.gov](mailto:RA-DHLTCRegs@pa.gov)

Dear Secretary Beam:

I am writing in support of the Department of Health's proposed nursing home regulations, which would require a minimum of 4.1 hours of resident care per day in every skilled nursing facility in Pennsylvania.

The tragedy which has unfolded in nursing homes in Philadelphia and across Pennsylvania over the past 18 months has revealed profound weaknesses in our state's long-term care system, all of which predate the pandemic. None of those weaknesses is more damaging than that of understaffing. Research has shown that adequate staffing is critical to ensure high-quality care and dignity for nursing home residents, yet too many facilities in our state lack adequate personnel to meet the needs of residents. Chronic understaffing not only meant that nursing homes were unprepared to meet the challenges of the pandemic, it also contributed to the poor working conditions and high turnover rates which have plagued this industry for decades.

There is no question that 2.7 hours of direct care is not enough, and I urge the Department to stand firmly behind their proposed shift to 4.1 hours per resident per day. Over 13,000 of Pennsylvania's most vulnerable residents have died in our nursing homes, and we have heard from constituents, family members, and caregivers in Philadelphia how this must never be allowed to happen again.

I join with them in applauding the Department's decision to call for 4.1 hours of resident care per day, and I urge the Department to maintain this high standard of care in its final regulations. **I further call on the Department to specify that hours of care be defined to include only the nursing staff who provide direct resident care; any concomitant decrease in ancillary staff hours should be strictly prohibited.** Finally, given reports that some nursing facilities are evading existing regulations, I call on the Department to ensure clear enforcement of these regulations and accountability for facilities that fail to provide high-quality care.

I understand that achieving adequate staffing will require investment on the part of the state—both to pay for more staff and to raise wages in the long-term care industry to attract committed caregivers,



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many of whom have left the bedside due to inadequate pay and poor working conditions. **I look forward to the Governor and the state legislature working to make sure that these regulations are fully funded.**

I join advocates across the state in fully supporting the Department's proposal to implement 4.1 staffing as soon as possible.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kendra Brooks".

Kendra Brooks  
Councilmember At-Large