



**From:** [Joel Clausen](#)  
**To:** [DH, LTCRegs](#)  
**Subject:** [External] COMMENTS on DOH Proposed Nursing Facility Regulations  
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Staffing Requirements:

First and foremost, I would suggest a change in verbiage when considering an increase in Nursing Hours Per Patient Day. In my interpretation, the words "per shift" are misunderstood. It is highly unlikely that you would require 4.1 hours per patient day on a per shift basis.

Additionally, I find that the staffing crisis in long-term care has become critical to the point of needing more career path promotion over a sudden jump in PPD from 2.7 to 4.1. It is simply unrealistic for smaller facilities trying to provide quality care in a field where staff are fearful of working because of the havoc COVID19 has caused.

I agree that it is time for an increase in the required PPD, but to go that quick, that fast would be hazardous to the care of many residents in facilities that will have to close doors.

Additionally, nurses and certified nursing assistants are not the only ones providing care to our residents. Many therapy staff, life enrichment staff, dining staff, and volunteers contribute to the health and wellbeing in many ways but are not presently considered in the calculation.

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