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Pennsylvania Department of Health
Office of Policy
Health and Wellness Building
625 Forster Street, Room 814
Harrisburg, Pennsylvania 17120
17 August 2021

Attention: Ms. Lori Gutierrez, Deputy Director

Dear Ms. Gutierrez,

Having worked in healthcare for over thirty years and as an individual whose family member utilizes the service provided by a skilled nursing facility, I am writing in strong opposition to the Department's proposal to increase the staffing requirements from 2.7 hours per patient day (ppd) to 4.1 hours on each shift.

My objection is based upon my personal, firsthand experience as both an employee and a consumer of long-term care services, demonstrating that a specific nursing home staffing ratio does not translate into quality of care. Beyond my personal testimony, a quick check of the Centers for Medicare and Medicaid Services Five-Star Quality Rating System shows communities throughout the Commonwealth with higher star staffing ratings, yet low results in quality measures and survey outcomes.


The federal government is no doubt aware that staffing ratios do not equate with quality as they have chosen not to mandate a minimum staffing hour ppd, recognizing that each nursing home has unique qualities such as the acuity of their residents, characteristics of the community and the training, competency and tenure of the staff who care for the residents. Indeed, their approach in using the facility assessment and resident care plan to determine staffing would be more effective in improving quality rather than an arbitrary staffing number.

Perhaps the most troubling aspect the Department's proposal to raise staffing requirements will be the unfair impact upon rural nursing homes. While all struggle during the worst staffing crises of our time, nursing homes located in rural, less populated areas have everyday challenges in hiring compassionate, quality staff owing to their physical location and lack of population. An inordinate staffing increase upon these small community nursing homes, many of whom have the best quality surveys in the state, will undoubtedly have a devastating impact.

One can only imagine the unintended consequence when these and other nursing homes are unable to find staff at any cost to meet the proposed increase in ppd staffing, namely, the closure of communities, the relocation of residents and an associated decrease in quality of care. Will my family member, very satisfied and content where she lives, be forced to move more than an hour away when they cannot find the extra staff to meet an arbitrary fifty percent increase in ppd staffing and her community closes?

It is commendable for the Department to focus on improving the quality of care of the citizens residing in our nursing homes and one appreciates your mission in this regard, however, the inadvertent negative impact of the proposal to radically raise staffing requirements far outweighs the suggested benefit. I would appreciate your reply to my concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Etchells', written in a cursive style.

Robert Etchells