



**From:** [Courtney D. Grafton](#)  
**To:** [DH, LTCRegs](#); [advocacy@phca.org](mailto:advocacy@phca.org)  
**Subject:** [External] Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)  
**Date:** Tuesday, August 24, 2021 1:32:14 PM

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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 Quality Life Services. We have multiple skilled nursing facilities throughout western PA. We employ approximately 1300 employees and provide services to upward of 1500 residents. As the Director of Human Resources and Employee Relations, 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. More pointedly, I can attest to our desire to hire, train and develop qualified and engaged staff. We desire to provide the best workplace to those that we appoint to take care of our residents.

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. When I began my career in HR in long term care 10 years ago, recruiting new staff was relatively easy. I can recall having entire afternoons filled with interview appointments. However, those days are long gone. It is an intense struggle to even get applications. With long term care being out-compensated by fast food restaurants, we can no longer compete with other industries. The stressful job of caring for other individuals is no longer compensated at an appropriate or desirable level. If staffing ratios increase, the reimbursement MUST also or there is no way ANY healthcare organization will be able to have enough staff to meet these numbers. It is frightening to hear that this has even been proposed or is being considered in today's employment climate. Headlines EVERYWHERE detail the lack of job seekers and yet our state is looking at mandating more workers...it's absurd and so far off the mark.

Every organization out there would love to staff at 4.1 ratios...how great that would be for our most vulnerable. I have in-laws and grandparents in long term care and would sleep better knowing that they had that much staff caring for them. However, it's not the reality.

I'm imploring you, please reconsider this regulation. This will put hundreds of thousands out of jobs and also residents with nowhere to go and no one to care for them.

## **Courtney D. Grafton**

Director of Human Resources and Employee Relations

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