



**From:** [Karle, Karen](#)  
**To:** [DH.LTCRegs](#)  
**Subject:** [External] Comments on proposed rule re: increase of direct resident care hours  
**Date:** Thursday, August 26, 2021 8:05:47 AM

---

***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](mailto:CWOPA_SPAM@pa.gov).*

To Whom It May Concern:

I don't think that you will find many nursing home residents, operators, employees or family members who don't feel that our residents deserve a higher number of staffing hours per day. However, unless the legislature is also looking at a significant increase in reimbursement and incentives for certified nurse aides, our facilities are being set up to fail. We simply cannot afford it and we don't have the staff nor resources to do it.

Our facility has consistently staffed above 2.7 – usually between 3.5 and 4.0. Since the pandemic started, we have struggled to find staffing to keep our facility at the number we are accustomed to. There is a severe shortage of licensed and certified staff in some areas of the state and stiff competition with hospital systems, who often have deep pockets and offer large incentives and higher salaries. While there are many dedicated, caring nurse aides, like many facilities, we have a high turnover of aides as some realize that this profession is not a good fit. Despite recruiting attempts, referral bonuses and retention incentives, we have very few applicants. In our area, the well is dry.

While I am only speaking for myself, I am frankly overwhelmed at the prospect of this challenge. If this legislation were to pass, it also needs to include a comprehensive plan that includes increased incentives to the individuals seeking license/certification as well as increased funding to facilities to afford the staff – if we can find them.

Thank you for reading my comments.

**Karen M. Karle, NHA**

Administrator  
Sarah Reed Senior Living  
227 West 22nd St.  
Erie, PA. 16502  
814-878-2611 (phone)  
814-878-2607 (fax)