



From: tonisoprano@verizon.net
To: [DH, LTCRegs](#)
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Subject: [External] Proposed increase in Nursing Home Staff Requirements
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FROM: Herbert and Toni Kestenbaum
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TO: Lori Gutierrez
Deputy Director
Office of Policy
625 Forster Street
Room 814
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Harrisburg, PA 17120

DATE: August 25, 2021

SUBJECT: Proposed increase in Nursing Home Staff Requirements

As residents at a CCRC for six years, we find your proposed increase in minimum nursing staff requirements deeply concerning. We think it would weaken our community and others in the Commonwealth.

There is already a severe shortage of nurses in Pennsylvania; it is hard enough to keep the nurses we have. Your rule would induce a frenzy of hiring additional qualified nurses (where would we find them?) and push wages up. More than ever, nurses would have a controlling role in setting those wages and shop around to find the highest bidders for their services.

Higher nursing staff requirements do not necessarily result in improved patient care. Other factors are at least as important, training, experience and familiarity with the nursing home's practices and procedures. Good patient planning is critical, as well.

Nurses are not the only professionals who deliver essential care to us. There are physical therapists, social workers, technicians and fitness and activity directors, for instance.

Where does your proposed new rule leave communities serving the elderly? With higher costs – for both institutions and individuals needing part-time nursing care at home -- and little guarantee of a significant increase in the quality of care.

At the very least, please delay instituting these requirements. This is an exceptionally difficult hiring environment at the moment, and nursing homes will need time to “staff up”.

Toni and Herbert Kestenbaum

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