

SIEMON'S LAKEVIEW MANOR
NURSING AND REHABILITATION
an Envoy Health Care Center



August 23, 2021

Department of Health
625 Forster Street
Harrisburg, PA 17120
Attn: Lori Gutierrez, Deputy Director
Office of Policy

Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)

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 Siemon's Lakeview Manor. Our nursing facility is a 120 bed facility located in Somerset, Pennsylvania. We employ 110 employees and provide services to 100 residents. As the Administrator, 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.

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.

Currently we have 20 employee vacancies and risk having to limit new admissions due to not being able to fill these vacancies. This problem has been ongoing the past few years but was severely impacted by the Covid 19 Pandemic. I do not see a possible change that would allow us to increase our PPD to 4.1. Funding has impeded our ability to pay increased staffing. Agency staff is basically unavailable and many staff are looking for work outside of healthcare. We have tried many recruitment and retention strategies, and incentive programs. We are a rural facility with several other facilities vying for the same workforce. It is a daily challenge to staff the facility as things are.

Thank you for your time in reviewing and considering our comments. We are hopeful that the Department will amend the provisions contained in §211.12(i) in a manner that will address the concerns raised in our comments.

Sincerely,

Martha Mosley
Executive Director