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Independent Regulatory
Review Commission

From: [LGAR Health and Rehab](#)
To: [DH_LTCRegs](#)
Subject: [External] regulatory changes
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August 25, 2021

Lori Gutierrez
Deputy Director, Office of Policy
625 Forster Street, Room 814
Health and Welfare Building
Harrisburg, PA 17120

Dear Ms. Gutierrez,

I am a speech therapist, as well as, the therapy manager, providing therapy services in a skilled nursing facility. I am writing to express my concerns about these proposed regulatory changes. I believe that all facilities should base NHPPD on resident care needs and staff experience. Facilities should consider the needs of the residents based on a combination of the Minimum Data Set (MDS) indicators, resident specific care plans, and staff interviews. I also believe that the therapy staff and recreational staff hours should be included in the NHPPD, as they provide care that promotes the resident's overall health and wellness.

As a therapist, I take pride in our therapy team, the nursing staff, and the entire care staff, all working together to serve the residents in these particularly difficult times. It is also more difficult to recruit and retain staff especially during a pandemic. However, we are doing all that we can to care for our residents.

Most of the residents we serve at LGAR Health and Rehabilitation Center are long term, and therefore, funding for all services is limited with no relief in sight. Please reconsider the regulations being proposed, and allow us to provide care, counting all service providers, including therapy in the numbers of staff when considering legislative changes.

Sincerely,

Janice Mull, MS/CCC-SLP Therapy Program Manager
Concept Rehab, Inc.
O 412-825-9000 x413



LGAR Health and Rehab Center

Celebrating 40 years of excellence in post-acute care.

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