



August 23, 2021

Lori Gutierrez
Deputy Director – Office of Policy
625 Forester Street, Room 814
Health and Welfare Building
Harrisburg, PA 17120
VIA Email to: RA-DHLTCRegs@pa.gov

Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)
28 PA Code Chapters 201-203 and 211
Deadline: August 30, 2021

The Pennsylvania Council on Independent Living (PCIL) is a membership organization that supports Centers' for Independent Living across the state. We believe that all individuals, regardless of age or disability deserve the opportunity to reside in the housing of their choice in the least restrictive setting as possible. We are pleased to see that the Department of Health is proposing to update the nursing home licensing regulations. This is the first of five packages of regulations that will be submitted.

PCIL is on a statewide committee appointed by the Department of Health (DOH) which includes the Center for Advocacy for the Rights and Interest of the Elderly (CARRIE) and Community Legal Services of Philadelphia (CLS). There can be no doubt that the current regulations are insufficient to protect the lives of residents. The residents and loved ones we represent are long overdue for improvements in the quality of their care and their surroundings. Considerable changes are necessary and comprehensive reform is essential. The response of the nursing home during the COVID-19 crisis was totally unacceptable and many lives were lost as a result. PCIL supports the recommendations highlighted in the letter from CARRIE and CLS.

We believe it is absolutely critical to **increase the minimum direct care staffing from 2.7 to 4.1 to ensure adequate care** in these facilities.

Thank you for allowing us to respond to these proposed regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Grier".

Michael Grier, MSA
Executive Director
Pennsylvania Council on Independent Living