



**From:** [Rosemary Port](#)  
**To:** [DH.LTCRegs](#)  
**Subject:** [External] New Proposed Staffing Levels in Nursing Facilities  
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Good Afternoon,

My name is Rosemary Port. I am currently a Nursing Home Administrator at Little Flower Manor Nursing Home in Darby, PA. I have been a licensed administrator since 2006, but have served as a full-time administrator for this facility for the past 3 ½. Prior to that, I was the Director of Nursing here for 18 years. I never voice my concern over changes to the regulations, but this time, I feel that I must speak up. I have been a nurse for almost 30 years and I have never seen a staffing crisis as big as the one we are currently experiencing in our industry.

I speak for my facility, but I know that we do everything we can to meet and exceed the staffing levels required to administer the highest quality of care. We are a 5-star facility that has been 10 years deficiency free in our health inspections. We usually average 3.4-3.8 PPD per day and that is without using any nursing staffing agencies. It is almost impossible to hire nursing assistants and nurses at this present time. We were the hardest hit industry during this pandemic and now we are being asked to attract and hire new staff. Who wants to work in a nursing facility when they can make more money in McDonalds, Walmart and Target? Small non-profit facilities such as ours cannot afford a 4.0 PPD. We have shown that we can provide excellent care at the levels we are currently working at.

It is my belief that the state of Pennsylvania should consider a stepped approach to these levels. The 2.70 is very low and needs to change but 4.0 is a big jump, especially during these difficult times. Has there been any consideration into having facilities reach a 3.0 in two years then a 3.50 in two more years then a 4.0? These would be reasonable benchmarks for us all to reach. We need time to bounce back from the last 16 months. It is going to take facilities time to regain their census and to rebuild staffing numbers. Please take this into consideration. We need to stop paying people to stay home. This is hurting the industry more than anything. We are making it more attractive to remain unemployed. There are staffing vacancies everywhere yet the unemployment numbers are on the rise again. Our industry is fighting a losing battle. The state of Pennsylvania needs to look at this situation with an objective mind. What is needed in our industry is nursing facility beds and this new proposed legislation will force good facilities to close their doors. I really don't think that will help any of us in the state of Pennsylvania, especially the vulnerable elderly.