

Administrative Office

998 Logan Boulevard
 Altoona, PA 16602
 814.696.4500
 800.400.2285
 Fax 814.696.4561
 Email: info@alsm.org
 www.alsm.org

SENIOR COMMUNITIES

The Lutheran Home
 at Hollidaysburg

The Lutheran Home
 at Johnstown

The Oaks at
 Pleasant Gap

COMMUNITY SERVICES

ALSM at Home

Senior Daily
 Living Centers

Counseling

CHILDREN'S SERVICES

Bedford &
 Fulton Counties
 Head Start

Bedford County
 Early Head Start

Family Center
 of Bedford County

Growing Years
 Early Learning Centers

Kid Stop Programs



August 26, 2021

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

Dear Ms. Gutierrez:

I am writing to comment on the proposed nursing facility regulations.

- 1) The proposed increase in the number of nursing hours from 2.7 NHPPD to 4.1 NHPPD on each shift. Please know a particular NHPPD does not equal quality. Each nursing home has unique qualities such as acuity of residents, training, competency, tenure of staff, and characteristics of the building. Studies have been done to support that the number of staff does not equate to quality of care. The federal government has chosen not to mandate a minimum staffing hour PPD because they do not want to stifle innovation;
- 2) There is a desperate need for nursing staff and it is extremely challenging to recruit staff in rural areas of PA that are not growing in population (especially professionally educated staff who opt to live in more metropolitan areas);
- 3) Uncertain timing of when the regulation for PPD increase will be effective and no time to ramp up. Please consider giving at least one year from the publication of the final regulations to ramp up and meet any final regulations;
- 4) Consider please that nurses and nurse aides are not the only staff that provide care to nursing home residents. Therapists, life enrichment staff, and others provide care that add to the well-being of residents. If there is a regulated increase in the PPD, please consider including these professionals in the PPD.
- 5) Financial stresses have been with nursing facilities that have a significant population of medical assistance residents. There has been no increase in this funding in seven years yet nursing facilities are to provide salary increases to staff to recruit and retain them.

Thank you for your attention and your consideration of the impact of the proposed regulations on the already burdened long-term care industry.

Sincerely,

Patricia W. Savage
 President/CEO
 The Lutheran Home at Hollidaysburg
 The Lutheran Home at Johnstown

OUR MISSION

To serve people through a ministry of love, compassion, and mercy in the name of our Lord, Jesus Christ.