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Subject: [External] Proposed increase staffing hours per patient day
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Lori Gutierrez
Deputy Director, Office of Policy

I am writing in strong opposition to the nursing home regulation proposal to increase staffing hours per patient day from 2.7 to 4.1. The ability to find enough staff at the current staffing hours has become increasingly difficult at this time. To increase the hours to 4.1 would make it impossible to staff nursing homes throughout the Commonwealth. If your goal is to force patients to stay in their homes, then you need to have a more robust at home care system in place than you do at present. Many people cannot stay in their own home for multiple reasons such as level of care needed that cannot be provided easily in a home. In addition, nursing homes are competing with all other businesses for employees. Reimbursement for nursing home care is pitifully low which also creates a competition problem. Are you planning a substantial increase in Medicaid reimbursement? Your regulation at this time will adversely affect the elderly population in the State. Nursing home beds will be reduced significantly and many nursing homes will go out of business. Those people relying on their employment will be affected negatively. Those families and elderly relying on nursing home care will be affected negatively. Please reconsider and remove this regulation at this time. Thank you.

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