



**From:** [Heather L. Allison](#)  
**To:** [DH, LTCRegs](#)  
**Cc:** [advocacy@phca.org](#); [Heather L. Allison](#)  
**Subject:** [External] Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)  
**Date:** Friday, August 27, 2021 11:48:28 AM

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August 27, 2021

Department of Health  
625 Forster Street  
Harrisburg, PA 17120  
Attn: Lori Gutierrez, Deputy Director  
Office of Policy

Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)

To Whom it May Concern,

Please accept this letter of comment on the recently proposed rule, "Department of Health, Title 28. Health and Safety, Part IV. Health Facilities, Subpart C. Long Term Care Facilities, 28 Pa. Code §§201.1-201.3: 211.12(i), Long Term Care Nursing Facilities".

This letter is being sent on behalf of the residents we serve and the direct care staff of Quality Life Services-New Castle. Our nursing facility is a 204 bed facility located in Lawrence County, New Castle, Pennsylvania. We employ approximately 115 employees and provide services to 100 plus residents. As the NHA, I can attest to our facilities commitment to providing the highest quality of care and prioritizing the needs of the residents we serve each and every day.

After reviewing the proposed regulation, we have grave concerns regarding the amendments to increase the required minimum number of hours of general nursing care from 2.7 to 4.1 hours for each resident and excluding other direct care provided by essential caregivers.

To explain, we struggle on a daily basis to employ qualified individuals. The work force is not present. If we had an available qualified workforce, we could increase our census as well. The decision to increase the minimum number of hours is not realistic and unfortunately if you are not a direct care provider, you are not aware of this. Staffing agencies are not the answer. The agencies provide licensed individuals who are unable to provide consistent care to our residents as they are moved to many facilities. Many people are not interested in working in healthcare due to the current situation of pandemic, staffing, changes and extremely regulated guidelines from many different governing bodies. I myself have been in healthcare for 29 years.

In regards to recruitment, many would rather work at a fast food restaurant, than provide hands on care to an elderly person. The pay rate is similar. The work is less

stressful. If the state truly intends to increase the minimum staffing requirement, they should consider funding the Long Term Care industry in ways to benefit employees with better wage availability.

Lastly, More is not always better. The care provided in many LTC settings is quality care. We take pride in caring for our residents and I would go as far to say they aren't residents, they are family. An increase in number of staff does not guarantee an increase in quality care. Long term care is not one size fits all. Each building is unique. Each building is located in a unique setting with unique needs.

Thank you for your time in reviewing and considering our comments. We are hopeful that the Department will amend the provisions contained in §211.12(i) in a manner that will address the concerns raised in our comments.

Sincerely,

**Heather L. Allison**

Administrator

**Quality Life Services - New Castle**

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724-654-7791 Ext. 3801

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**Central Admissions - 1-888-835-4557**

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