



8/26/21

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 Laurel Ridge Center. Our nursing facility is a 61 bed facility located in Uniontown, Pennsylvania. We employ 50 employees and provide services to up to 61 residents. As the Center Executive Director, I can attest to our facilities commitment to providing high quality 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.

I am **not supportive** a regulatory proposal that would require nursing homes across the commonwealth to increase minimum staffing requirements from 2.7 to 4.1 hours of nursing care per resident per day.

Although this might "sound good on paper" and to the general public that have never worked or had anyone that had worked in a nursing home, it's not realistic. With the current shortage of nurses and CNA's across the United States, including Pennsylvania, it only got worse during the COVID-19 pandemic. How could this possibly be a good time to propose a new regulation mandating more nursing and CNA coverage when we can barely find enough help to take care of our elderly now? We are proud to say that our facility is one of the better ones for care as documented by our positive google reviews, word of mouth and family/resident surveys conducted year after year. We still can barely find enough help and that includes us trying to contract with agency staff. There just aren't enough nurses available anywhere to fill the voids at this current time. So to raise the staffing requirements from 2.7 to 4.1 at this point in time would not make sense. Not only will we lose more nurses and CNA's, you will most likely cause many facilities to shut their doors forever, leaving no place to go for the elderly that need us.

Now, if you were to include other\_essential care workers like, physical therapists, occupational therapists, dieticians, wound care nurses, activities directors, etc. then, maybe, this would help get everyone closer to the proposed 4.1 but if not, then it would be impossible to meet this regulation with just nurses and aides included.

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,  
Brian R. Bazylak, NHA