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To: [DH, LTCRegs](#)
Subject: [External] Rulemaking 10-221 comments
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My Comments re the proposed PA Nursing Home Regulations, pertaining to Rulemaking 10-221

(Long-Term Care Facilities, Proposed Rulemaking 1)

My father is 94 and a resident at a fine nursing home in Berks County. That being said, I feel that his care could be better. My sister and I take turns in order to have someone visiting him (for a max. of 2 hours) every day. In Feb. of 2021, we had to request placing Dad in the "Compassionate Care" category so that we could see him and help him manage the loneliness and isolation. He was definitely in need of extra support. Already thin at about 140 pounds, pre COVID, he sank even lower. After the transfer in July of 2020, from the memory unit where he lived with our mother for years, he became even weaker from lack of activity and nutrition. He was truly in a failure to thrive situation as the staff did not have the time to sit with him and make sure he ate his meals. He didn't know any of them and was not always the most cooperative as he was extremely confused and alone. The facility does not have enough staff to provide the kind of engagement that he needs. The staff is kind and loving, but there are just not enough of them. When he fell trying to get to the bathroom from the bed, he lay on the floor for a while before anyone found him. I know the staff was very upset about this, and Dad receded even more with the combination of the pain from the bruising in his hip and back and fear of falling, etc. He dropped even more pounds as he was not eating again.

The COVID Pandemic has highlighted this weakness in our eldercare standards in Pennsylvania. We must expect more! I am sure that it will not be easy for facilities to increase their staff sizes, but the research clearly shows that to provide adequate care there must be a minimum standard for direct care staffing hours of 4.1 hours. Pennsylvania is woefully behind many parts of our nation in requiring more time with the residents. Other states and institutions do provide a higher staffing hour total, even in Berks County! It is doable. Please

Comprehensive reform of our state's nursing home regulations is sorely needed. Thank you for doing this work!

Sincerely, Fern Culhane