



**From:** [Ellen Gilbert \(via Google Docs\)](#)  
**To:** [DH, LTCRegs](#)  
**Cc:** [senatorcomitta@pasenate.com](#); [repherrin@pahouse.net](#)  
**Subject:** [External] Opposition to DOH Proposal to increase Hours per Patient Day  
**Date:** Monday, August 30, 2021 11:54:37 AM

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Gutierrez 8-10-21 re DOH regs.docx

### Snapshot of the item below:

*Ellen Gilbert  
1006 Robin Drive  
West Chester, PA 19382*

August 27, 2021

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

Dear Deputy Director Gutierrez:

I serve on the Board of Barclay Friends in West Chester. We are a community-based nonprofit serving older adults in our community in the Quaker tradition, and we are an affiliate of the Kendal Corporation.

I learned recently about the Department of Health's proposed regulations to increase the required staffing ratios for skilled nursing facilities from 2.7 to 4.1. This new ratio will not affect Barclay Friends directly, because we already staff at this higher level. However, other facilities will need to

increase their staffing to meet this new ratio, adding further competition for an already scarce pool of qualified labor.

One of the major strategic issues we, the Board and Administrative Leadership, have been addressing is the profound lack of workforce. Barclay Friends has been having great difficulty recruiting RNs, LPNs and CNAs to fill our current vacancies, despite paying competitive wages and benefits, and offering a great workplace environment. Our hiring managers receive few qualified responses to online job listings; few candidates who actually show up for scheduled interviews; and poor quality of those candidates who do arrive for interviews. This has been going on for a number of years, and the pandemic has just intensified it.

Your department must be aware that the shortage of qualified healthcare workers is a national shortage, affecting not just Pennsylvania, but the entire country. To put these regulations in place without addressing the workforce shortage is highly likely to cause our older adults in Pennsylvania to get worse care, in nursing homes and in home care, despite the appearance of the regulation to be about increasing quality of care.

At Barclay, we would like to see you take a more comprehensive approach that includes increased training programs for new nurses and CNAs, immigration reform to increase the pool of qualified foreign-born workers, and increases to the Medicaid reimbursement rate.

Sincerely,

Ellen Gilbert  
Board Member, Barclay Friends

CC: Senator Carolyn Comitta, Representative Kristine Howard

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

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