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Subject: [External] Proposed Nursing Facility Regulations  
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Good afternoon – I have been an NHA for almost 40 years and am still going strong in a corporate role overseeing SNFs and PCs. Having seen so many changes over the years – yes, starting with OBRA 87 - I am very used to calmly addressing any new regulation that comes our way. I believe that the spirit and intent of most regulations is positive and often leads to something better. At the same time, I believe that most regulations are a way to try to badger poor performers into doing better. Didn't work in 1987, still isn't – those who want to just piffer profits, continue to do so. In fact, more than ever. So we just figure it out so we can continue to do what we do – take good care of older folks.

And I would love to figure these changes out too. We budget some of our skilled nursing communities at 4.1 or over already. In some cases, it just isn't necessary because the acuity is such that other team members are more appropriate. For example, recreation. We hire certified therapeutic recreation specialists to lead our lifestyle programs because they are more qualified to develop specific, meaningful programs for residents – not just fill a calendar with traditional 'activities'. We like to have universal workers and nurse service helpers to do the things that it doesn't take a CNA to do – make beds, pass trays, fill water pitchers, etc. This provides a way for people to try out working in a care community and entering our workforce without the commitment to a long class. A fixed care hour formula does not encourage this kind of creative way to handle the workforce challenge.

We are trying absolutely everything we can think of to recruit and retain nursing staff. A mandate doesn't change that. We can't just raise prices like Sheetz or Burger King. The lack of Medicaid funding suggests that perhaps skilled nursing isn't valued at all. Please reconsider this. Consider an incremental approach. Look at what other states are doing. We really are trying our best and just need a break. Thank you,

Bobbie Gray

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