

QUALITY *Life* SERVICES™

08/30/2021

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 who work at Quality Life Services. As the VP of Home Care and Hospice for Quality Life Services, I collaborate with our nursing homes operating across the Commonwealth to provide support and post-acute care services. Our organization is committed to providing high quality care and prioritizing the needs of the residents we serve each and every day.

After reviewing your proposed regulation, we have concerns regarding the mandatory increase of the minimum number of hours of general nursing care from 2.7 to 4.1 hours for each resident, which excludes other direct care provided by essential caregivers.

We are not supportive of the increase in general nursing care from 2.7 to 4.1 hours for each resident, which excludes other direct care provided by essential caregivers. There is a significant workforce shortage, inadequate reimbursement rates that create challenges with providing employees with appropriate pay rates for the specialized positions that they perform. Due to workforce shortages, LTC is utilizing a significant amount of Agency Staffing that is not sustainable. Direct – essential care workers must be considered as part of the State's staffing minimums, such as Physical Therapists, Dieticians, Wound Care Nurses, Activities Directors, etc.

Thank you for your time in reviewing and considering our comments. We are hopeful that the Department of Health will address our concerns and work with providers and staff to ensure continued access to long-term care services in Pennsylvania. We are hopeful that the Department of Health will amend the provisions contained in §211.12(i) in a manner that will address the concerns raised in our comments.

Sincerely,

Devin Kassi, PT, DPT

VP of Home Care and Hospice for Quality Life Services