From: <u>edward keenan</u>

To: <u>DH, LTCRegs</u>; <u>Susan McCrary</u>

**Subject:** [External] Department of Health Proposed Nursing Facility Regulations

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I would like to offer some concerns I have as a professional social worker with 47 years experience of serving older Pennsylvanians, 27 as a AAA a Director and, for the last 12 years, as a Board member of St. Ignatius Nursing and Rehabilitation Center and the same number of years as Chair of the Center's Quality and Mission Enhancement Committee. My concerns are fundamental. They concern the proposal now under consideration that lacks understanding of what nursing homes are and can do for older adults with multiple losses and disabilities and the collaborative team of caregivers that sustains and supports them 24/7. The proposed latest policy decisions are simplistic, increasing the nursing hours (NHPPD), which equates a single number with quality care. Even new staff to nursing facilities recognize two fundamental facts. The complexity of the needs of residents. And, the comprehensive nature of the services performed by so many staff to assure the appropriateness of the level of care. Care in a nursing home is a "team" effort, first and foremost. Reducing comprehensive care to a single number seems to lack basic understanding. It reads like a bad novel: "Logarithm Outlaws Along the Susquehanna." The potential effect of such a change could be catastrophic - the end of service for some nursing homes. The fact that this change is being proposed in the midst of a pandemic, in the midst of a nation-wide shortage of nurses and shortages of all levels of staff in the health care community seems callous and, one wonders: "Is anyone in charge in Harrisburg?"

Perhaps, policy staff could use a couple of refresher courses in management and human services sans the logarithms.

Edward J. Keenan St. Ignatius Nursing Home Chair, Quality & Mission Enhancement Committee