



Dear Secretary Beam,

My name is Patrick Keenan and I am the Director of Consumer Protections and Policy for Pennsylvania Health Action Network (PHAN). PHAN is Pennsylvania's only statewide, consumer-led organization, focused on achieving quality, accessible, equitable, and affordable healthcare for all Pennsylvanians. Every year, we talk to over 10,000 Pennsylvanians statewide. We assist people in enrolling in health insurance coverage. We also help with problems of accessibility and affordability of healthcare, including unaffordable medical bills, problems accessing providers, long travel or wait times for care, denials of medically necessary care, and many other similar issues. All of these personal interactions show us just how much Pennsylvania's families and seniors struggle to access healthcare. In that capacity I am writing in support of the Department of Health's proposed regulations which call for 4.1 hours of nursing care per resident-day in Pennsylvania's nursing homes.

Our state's nursing homes have been critically understaffed for decades, leading to low-quality care, high staff turnover, and neglect of residents. Furthermore, understaffing left our state's nursing home industry completely unprepared to meet the challenges of Covid-19, with tragic consequences including over 13,000 resident deaths. With Pennsylvania's population aging rapidly, it is a moral imperative to ensure that our most vulnerable residents receive the care they need. We fully support the Department's decision to listen to advocacy groups including CARIE, the AARP of Pennsylvania, and SEIU Healthcare Pennsylvania in calling for 4.1 staffing, which is supported by research and has been a central demand of resident advocates for many years. The Department's budget estimate for this measure indicates that it would cost just \$182.5 million in new state funding, an increase of less than 1% in the state's Medicaid budget; resident dignity and safety is well worth the price.

While the Department's proposal of 4.1 staffing is vital, the regulations rolled out so far do not discuss in detail which job categories will be counted towards staffing. It is vital to ensure that only *nursing* staff hours provided by RNs, LPNs and CNAs are counted towards this number; it is these care workers who provide direct resident care every day. I hope the Department will make this clear in future packages.

Pennsylvania's nursing home industry has been broken for decades, and the Covid-19 pandemic has made the consequences of this failure clear to all. We owe it to the thousands of nursing home residents who have died in the past two years to use this moment to bring real change to the industry. Requiring 4.1 hours of nursing care per resident day is the single most crucial step the department can take towards high-quality nursing home care, and we call on the department to move forward to implement this as quickly as possible.

Thank you for your consideration on this important matter. Please do not hesitate to contact me at [patrick@pahealthaccess.org](mailto:patrick@pahealthaccess.org) if you have any questions.

Best,  
Patrick Keenan