



August 27, 2021

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

Good Day Ms. Gutierrez,

I am writing on behalf of St. Ignatius Nursing & Rehab Center, which is a not for profit Catholic Healthcare Ministry of the Felician Franciscan Sisters and employs approximately 170 dedicated staff in West Philadelphia. The majority of the seniors that we care for are low-income and have few options for obtaining the excellent care and services that we provide.

I am the President and CEO at St. Ignatius and have been on staff here for 19 years. During my tenure, I have always been a vocal advocate for our seniors by writing letters and traveling to Harrisburg to meet directly with legislators on behalf of our frail seniors. At the height of the pandemic in March, April and May of 2020, we were severely affected by COVID-19 in our facility. We lost residents and many others contracted the virus, as did some of our staff as well. We worked heroically to keep the virus from spreading and continue to do so successfully today with strict adherence to wearing PPE and practicing all required infection control practices including mandatory testing and vaccination adoption. We love caring for our residents and cannot imagine not being able to do so due to added burdens related to newly proposed regulations.

The changes in staffing requirements that are being proposed will have a devastating effect on our ability to operate our facility within the proposed guidelines, especially if no additional funding is included to help pay for the additional staff to meet the daily requirement. Right now, as are other facilities and even other industries around the country, we are facing ongoing challenges in finding staff to provide care to our residents. I have never seen a staffing crisis like this in all my time in this industry. This proposal could not be coming at a more inopportune time.

If one of the reasons for increasing the PPD is to increase quality care, I truly believe that this is misguided thinking. A certain number related to PPD does not necessarily translate to enhanced quality. As you know, so many factors go into quality care like competency of staff (not just the number of staff), training, acuity of residents, etc. To artificially set 4.1 as the minimum staffing level on each shift seems so arbitrary. How was this number derived? If this truly is adopted, will there be significant time to ramp up? Will others that provide care to residents like therapists be included in the 4.1 calculation? Speech therapists provide significant assistance to residents when evaluating them during a meal.

Lastly, I would like to add that as a mostly MA funded facility, if we are forced to increase our minimum daily staffing, there is no funding available to cover the costs of recruitment and the associated benefits for hiring these individuals. As you are aware, we have not seen a Medical Assistance rate increase in seven years. We continue to be underfunded.

In closing, I would like to ask, on behalf of our residents and the staff that we currently employ, please consider not adopting this proposed regulation change. It will have an adverse effect on our ability to keep our facility viable and open to care for the least among us.

Sincerely,

Susie

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