

**From:** [Carol McKinley](#)  
**To:** [DH, LTCRegs](#)  
**Subject:** [External] Proposed Regulations  
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I am very coming concerned about the proposed regulations to increase staffing to 4.1 ratio. Several reasons relate to my concern:

1. The severe current shortage of aides is already a major issue. Where will the additional staff come from? If we can't get staff, good nursing homes will be out of compliance for an issue that is nationwide, and will put us all in deficiency status with potential financial penalties. We are already seeing areas that f nursing homes shut down because of staffing issues. I am a provider but also a daughter. My 95 year old memory impaired mother is in a nursing home memory care unit. That unit shut down last week for lack of staffing. My mother is now on a regular long term care floor more confused than ever.
2. How will the cost of additional staff be covered? Pennsylvania has not raised their Medicaid rates in 7 years. Managed care and private insurance is not interested in increasing their rates. Private pay residents cannot shoulder the shortfall. My mother is a private pay resident in the nursing home. Increased by her rate will only push her to apply for Medicaid faster
3. Aides are not the only providers of care and service. This ratio excludes other professionals who support care and services of our residents.
4. How will this regulation go into effect - immediately upon approval? Nurse g homes are struggling now to meet the ratios because of staffing shortage. We are covid meeting with other enterprises that can pay large bonuses, higher pay - a not for profit nursing home just can't do that.
5. Nurse BG homes are able to assess and judge by acuity their staffing needs of multiple professions - they should continue to be able to do that - letting the judgement of quality care of the many areas on which we are surveyed and assessed determine are care abilities.

Ultimately, the workforce issue and payment of issue has to be resolved. While some may be pushing this to put nursing homes out of business, there is a place for them. I could not have cared for either of my parents on their home as their care needs became more challenging.

Additionally, home care services were not readily available, unable to count on personnel to show up, dealt with many strangers or n my parents homw which was distressing to them, and home care struggles with same staff g issues.

Please do not pass this regulation. It is not realistic to what is occurring in today's world.

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