



From: [Annette Melovitz](#)
To: [DH, LTCRegs](#)
Subject: [External] Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking) * letter of support
Date: Tuesday, August 31, 2021 6:22:32 AM

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As a family member and Healthcare Advocate of a 89 year old parent who resides in a LTC facility, I'm fully supportive of the Pennsylvania DOH motion to institute sweeping and critical changes to the the structure, ownership/administration, staffing requirements and daily operation of nursing homes as we currently know them.

I spend approximately 20 hours a week in the LTC facility to ensure my relative gets the nursing care she needs and is paying for. It is both frightening and disgraceful that families should be forced to do this to protect their loved ones. The nursing home websites promise they will take care of everything and residents will live with respect and dignity in a safe, healthy and enjoyable environment. This is a lie. Nursing homes and their Corporate entities focus on filling empty beds with bodies to generate profit. Our frail, elderly once inside are trapped in a sub culture with little to no to receive standard of care nursing in order to ensure their health and safety.

I've questioned policies/procedures in the nursing home and revied very vague answers with no printed policy or documentation to support current facility rules/policies as they apply to residents/family members.

Our family and other families were told by Administration if we weren't satisfied w of the nursing care they would help us to find another LTC facility for our relative.

A nursing staff member told me angrily.

"you think every time you open your big mouth she should get care, what are we supposed to do, I can't help it if we're short staffed". The employee then ordered me to get out of my relatives room.

I've observed the following during visits to the facility:

my family member sitting in urine soaked briefs not having been kept clean/dry

Documentation by dental professional (DMD) of gingivitis, cavities due to poor or complete lack oral care for resident

Resident not checked for repositioning after excessive sitting.

Lack of hand washing and infection controll protocols being stringently followed to reduce hand to hand transmission of bacteria/ infection.

Staff commenting they "can't wait until the shift is over" or " go home"

Residents allowed to linger in rooms for hours with no staff to assist them getting outside.

The core issue remains low wages, unskilled labor and lack of strong leadership (leading by example) and huge deficiencies in clinical oversight and patient assessment these facilities.

It is cruel not only to residents but to staff to allow a 20:1 care ratio on a nursing floor. That ratio would not be allowed in a day care, public school system or a State/County Correctional facility. It is central to the core issue of lack of standard of care nursing in PA nursing homes.

I fully support the 4.1 hours of nursing care standard to be put into effect. Therapy should not be included. That is a separate specialty. Nursing care is what is desperately needed by residents.

There are some dedicated and competent nursing staff within the facility that can be trusted to deliver appropriate care, however it appears agency staffing continues to dominate nursing home care which is resulting in poor healthcare outcomes, due to many agency staff having a “hit and run” care approach with little knowledge of the residents health history or true needs.

I support:

1) Systemic Changes to Direct Care Staffing to increase direct care staffing hours (4.1) and direct care staffing to resident ratios, as well as to adjust direct care staffing upwards from the minimum as needed to address individuals’ assessed needs, overall resident acuity, and other facility-specific factors (such as physical layout features or operation of specialized units).

- Improvements in Training Requirements including minimum training hours for direct care and other staff with specific articulated training areas and demonstration of competency.
- Infection Prevention and Control Requirements that ensure each nursing home has full-time expert staff on hand to prevent and control infections.
- Emergency and Pandemic Preparedness Planning Requirements so that nursing homes must meaningfully plan for how to address emergencies and to prepare for pandemics or other outbreaks.
- Application for Licensure and for Change of Ownership Procedures that ensure that the application to operate or purchase a nursing home requires a thorough evaluation of the applicant’s experience, expertise, and financial capacity to provide high quality of care.
- Residents’ Rights Improvements to update regulations that are over 20 years old and don’t protect all residents from discrimination or ill treatment.

Thank you,
Kay France