



**From:** [Alex Metricarti](#)  
**To:** [DH, LTCRegs](#)  
**Subject:** [External] Nursing home staffing regulations  
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Hi,

I work for non-profit nursing homes in the Philadelphia area - Dock Terrace and Souderton Mennonite Homes.

We already staff well above the 2.7 ppd requirement, and would love to return to our usual staffing levels. But we can't hire enough nurses and cnas as it is. If you raise the state requirement to 4.1, the most likely outcome is that we will not be able to take new residents, as we'll need to decrease census to get to the 4.1 level. We are actively seeking new candidates - raising pay rates and aggressively advertising our open positions, to no avail. In 2018 we had something like 450 CNA applications for available positions. This year so far we've had 55. The candidates are not out there!

In addition, until you raise Medicaid rates, there's no way most nursing homes can afford to hire more workers. What's is been? Something like 7 year since the Medicaid rate has increased?. The current Medicaid reimbursement is less than half of our private pay daily rate. That is simply unsustainable.

Is raising ppd to provide better care for residents a good idea? Of course. Is there an actual way to make that happen? Not without a whole lot more funding.

Thank you,

Alex Metricarti  
610-405-8709

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*Alex Metricarti*