



**From:** [aschaeffer90](#)  
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**Subject:** [External] Lori Gutierrez, Deputy Director, Office of Policy  
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As a employee of Dallastown nursing center I'm telling you this is not acceptable. You guys are wrong for trying to impose such a thing! Ewwwww.

This proposal is not only an abuse of power but will decrease quality of resident care while increasing expenses.

There is less burden on the DOH surveyors to apply the 45 pages of DOH regulations and application guidelines than the hundreds of pages of regulations found in Appendix PP State Operations manual for the nursing facilities to apply.

None of the relevant stakeholders where consulted this proposed legislation as should have been. We should not be subject to regulations designed to meet the Federal conditions of Medicare and Medicaid for reimbursement when we purposely do not accept those funds. By proposing to apply onerous regulations, that cannot be met, will place unrealistic financial, staffing and operational burdens on organizations that are being funded by older adults. The proposed requirements will only greatly increase reporting and documentation measures by nurses and nurses' aides. This means more time spent at a computer than with the resident.

The proposed requirements will be costly. It will require hiring an RNAC-RN for a job that doesn't exist to certify and submit documentation. It will also require purchasing even more costly software of thousands of dollars. This is also exposes us to Civil Monetary Penalties as there are items, we are unable to report as we don't accept Medicare and Medicaid reimbursement.

- Dallastown Nursing Center wants to allow the nursing home staff time to spend with providing care rather than sitting at a computer documenting for Medicare money that we don't get.
- Our quality-of-care Dallastown Nursing very good/excellent, we don't need the Federal regulations to be imposed on the staff while we receive no funds from Medicare or Medicaid
- The costs of care will go up for us as our Nursing Facility care is Resident funded
- We are in the middle of a COVID pandemic, there are staff shortages, the imposition of additional government requirements is burdensome and unnecessary
- Provide any personal stories about your care in Dallastown Nursing Center

WHAT YOUR TRYING TO DO IS ILLEGAL AND WRONG. STOPPPP.

Sent from my Verizon, Samsung Galaxy smartphone

