



August 30, 2021

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

RE: July 31, 2021 proposal to update nursing facility regulations the Department of Health (DOH) published in the Pennsylvania Bulletin a portion of its proposal to update nursing facility regulations

Dear Ms. Lori Gutierrez,

The proposed regulations seek to require nursing homes to increase the requirements for staff from 2.7 Nursing Hours Per Patient Day (NHPPD) to 4.1 NHPPD on each shift. Since the summer of 2015 St. Anne Home Nursing Facility has had difficulty recruiting and hiring nursing staff. This has only been exacerbated during the COVID-19 pandemic for a number of reasons including those leaving due to concern for their own health and increased payments in the unemployment system.

Currently for second quarter ending June 30, 2021 St. Anne Home receives between \$212.70 to \$212.24 per day from the Managed Care Organizations, funded by Pennsylvania through the MCOs. Twelve years ago, for the second quarter ending June 30, 2009 St. Anne Home received \$215.02 per day to care for older adults that where eligible for the nursing facility Medical Assistance benefit. **We are reimbursed less today from the Pennsylvania Medical Assistance Program reimbursement system than we were 12 years ago, while cost have continued to increase.**

With the current staffing crisis, we have had to fill many nursing positions with agency staff at a premium cost. Agency hourly rates for RNs, LPNs and CNAs have been found to be as high as \$97 per hour for RNs, \$83 per hour for LPNs and \$66 per hour for CNAs in our Western PA local market. While recent wage surveys conducted in January of 2021 by trade

associations representing nursing facilities have found median statewide hourly rates for RNs, LPNs and CNAs to be \$35.52 for RNs, \$25.59 for LPNs and \$16.36 for CNAs. We have continued to look for innovative ways to recruit and retain employees. We have made increases to start rates and sign-on bonuses but still find it difficult to compete with hospitals and agencies. We also continue to do appreciation activities for our staff as they have tirelessly worked throughout the pandemic to care for the residents of St. Anne Home. The financial implications of reimbursements being lower now than 12 years ago coupled with wage rates that have skyrocketed have created the perfect storm for senior services.

The proposed regulations state that the 4.1 NHPPD will become effective on the date of publication as final. There is no way to know when this might occur. NFs cannot plan to increase staffing without notice and time to ramp up. Facilities need to be given time to increase staffing to ensure that the minimums are being met.

We all want to be able to provide the best quality of services to the residents that we serve each and every day so please consider my above statements in finding ways that we can both be financially stable and provide those services.

Thank you for your time and consideration.

Sincerely,

Raven Schaetzle, MBA, PHR, SHRM-CP
Director of Human Resource & Corporate Compliance Office
St. Anne Home