



QUALITY *Life* SERVICES™
Markleysburg

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August 24, 2021

Department of Health
625 Forster Street
Harrisburg, PA 17120
Attn: Lori Gutierrez, Deputy Director
Office of Policy

Re: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)

To Whom it May Concern,

Please accept this letter of comment on the recently proposed rule, "Department of Health, Title 28. Health and Safety, Part IV. Health Facilities, Subpart C. Long Term Care Facilities, 28 Pa. Code §§201.1-201.3: 211.12(i), Long Term Care Nursing Facilities".

This letter is being sent on behalf of the residents we serve and the direct care staff of Quality Life Services - Markleysburg. Our nursing facility is a 60 bed facility located in Markleysburg, in Fayette County, Pennsylvania. We employ 60 employees and provide services to 51 residents. As the Human Resource Director, I can attest to our facilities commitment to providing high quality care and prioritizing the needs of the residents we serve each and every day.

After reviewing the proposed regulation, we have grave concerns regarding the amendments to increase the required minimum number of hours of general nursing care from 2.7 to 4.1 hours for each resident and excluding other direct care provided by essential caregivers.

The many challenges we have with staffing levels is very hard with the level of 2.7 hours for each resident now is so very difficult with COVID and the unemployment monies that is given to individuals to stay home is almost impossible to obtain. Although having the care of our residents with a 4.1 would be absolutely wonderful, it is unobtainable. Not to mention the fact we have to pay the high cost of Agency staffing to just make it to 3.0, this takes away from the cost of other things very much needed to take care of our wonderful residents.

Thank you for your time in reviewing and considering our comments. We are hopeful that the Department will amend the provisions contained in §211.12(i) in a manner that will address the concerns raised in our comments.

Sincerely,
Judy D. Ream, HR Director for QLS-Markleysburg.