



8/30/21

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".

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This letter is being sent on behalf of the residents we serve and the direct care staff who work at Quality Life Services. As the Director of Dietary Services, I oversee ten Dietary departments in skilled nursing facilities, operating across the Commonwealth. Collectively, these facilities are licensed for 1007 beds, employ 1200 employees and serve 754 residents. Our organization is committed to providing high quality care and prioritizing the needs of the residents we serve each and every day.

After reviewing your proposed regulation, we have concerns regarding the mandatory increase of the minimum number of hours of general nursing care from 2.7 to 4.1 hours for each resident, which excludes other direct care provided by essential caregivers.

Quality Life Services continues to struggle with recruiting and retaining staff in all departments as well as the nursing department. Mandating a 4.1 hour to resident ratio will not resolve the recruitment concerns and only compound the challenge. This ratio will require an increase of funds to support it which is not noted to be available. There will also be an increase need to rely on agency staff, without the increase of funds and resources to do so. The proposed ratio does not necessarily support facts of improved quality of care. A residents' care in a skilled nursing facility is not limited to direct nursing care. They receive care from therapists, dietitians, wound care nurses and even the activity department. These care givers should be considered in the ratio as well. There would be a deficit in the residents care without them.

Thank you for your time in reviewing and considering our comments. We are hopeful that the Department of Health will address our concerns and work with providers and staff to ensure continued access to long-term care services in Pennsylvania. We are hopeful that the Department of Health will amend the provisions contained in §211.12(i) in a manner that will address the concerns raised in our comments.

Sincerely,
Danielle Steighner, RD, CSG, LDN