

**Stephen Hoffman**



**From:** IRRC  
**Sent:** Tuesday, June 21, 2022 12:02 PM  
**To:** Michelle Elliott; Laura Campbell; Fiona Cormack  
**Cc:** Stephen Hoffman  
**Subject:** FW: Comments on proposed changes to Skilled Nursing Facility staffing requirements in PA

Form Letter A comment on #3343.

*Kathy Cooper*  
Independent Regulatory Review Commission  
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**From:** Natalie McKay <nmckay@concordialm.org>  
**Sent:** Tuesday, June 21, 2022 11:31 AM  
**To:** IRRC <irrc@irrc.state.pa.us>  
**Subject:** Comments on proposed changes to Skilled Nursing Facility staffing requirements in PA

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My name is Natalie McKay and I work for Concordia Lutheran Ministries, a senior/health-care organization headquartered in the Commonwealth that serves close to 50,000 people every year – primarily our vulnerable elderly population. I’m writing you today to express my concern over the Department of Health’s proposed changes in staffing requirements for skilled nursing facilities. Simply stated, the tertiary consequences of these proposed requirements carry catastrophic potential for our industry and older Pennsylvanians.

Concordia has a longstanding reputation for high quality care and placing the needs of our patients and residents above all else, as evidenced in part by our being the inaugural recipient of the Pennsylvania Department of Aging Excellence in Quality Care Award. We strive to be a leader in our industry and serve those in our care with the utmost love, respect and compassion. We have battled the pandemic and furthered our mission during a time of unprecedented inflation and regulatory oversight, and without the benefit of a Medicaid reimbursement increase in six years.

Since the “Great Resignation” that was fueled by the COVID-19 pandemic, staffing in our industry has become a challenge. Concordia is blessed with considerable size and resources, but we have felt the impact as well. While we believe our legislators have good intentions, the proposed staffing requirements have the potential to devastate the industry and force many providers to close their doors permanently. If you have ever had a loved one who needed inpatient senior care services, you know the importance of having options – especially options that are close to home. We have weathered this storm so far by increasing wages 18-20%, adding employee perks and restructuring an already impressive benefits package. But for many providers, the proposed staffing requirements have the potential for disastrous outcomes:

1. The requirements will compel many providers to either implement or increase the use of agency staffing, which will impact the continuity of care our vulnerable seniors receive.
2. The requirements will limit many facilities’ ability to accept new admissions, which will impact hospital census and bed availability, as well as patient/resident choice.

3. The requirements will cause significant financial hardships that will lead to the closure of many smaller skilled nursing facilities, especially those in rural areas.

I urge you today to be an advocate for the nursing home providers and staff that we have all celebrated for the last two years who care for the sick and elderly every single day – and oppose staffing requirements that will actively harm them and their industry. We believe wholeheartedly that residents need and deserve top quality care, and that skilled nursing facilities need to provide the staffing ratios required to do so effectively. But the proposed staffing requirements will do more harm than good. Thank you for your consideration.

Sincerely,  
Natalie McKay

Natalie McKay, NHA, MHA  
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