



June 22, 2022

Pennsylvania Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Pennsylvania Independent Regulatory Review Commission:

I am writing to you with my concern over the Department of Health's proposed changes in staffing requirements for skilled nursing facilities. While we agree in the theme of what this proposal is about – ensuring that the vulnerable population we serve in our Nursing Care Centers are given the best staffing and care possible – we do respectfully disagree with these proposed changes.

These proposed staffing requirements will place an undue burden on us as providers. Our skilled nursing neighborhood is a part of the larger Asbury Communities organization, a not for profit group of community living campuses with five communities in Pennsylvania serving about 2,100 total residents and 330 who reside in Nursing Care Centers, including 80 we serve in our Nursing Care Center here at Asbury Springhill.

Over the past couple of years with the pandemic we have seen many health care workers leaving the workforce, our staffing has been challenged and the use of agency staff for RN, LPN and CNA roles has increased, and we believe it will be difficult to provide our current level of high-quality care to residents and try to meet this proposed daily ppd of 4.1 and the accompanying ratios. This requirement will likely impact bed availability in our counties and choice for where residents will receive care.

We participate in Medicare and Medicaid and our Medicaid reimbursement is not increasing to help us with care needs of residents but now will primarily be funding our staffing requirements.

All of these factors lead us to not support this proposed Regulation #10-224 as it stands now.

I am asking you to work with us as the providers of care to our aging population in Pennsylvania and be realistic about staffing requirements and the proposed staffing ratios. Thank You.

Sincerely,

Sharon Belovarac

Sharon Belovarac RN-BC, BSN NHA
ForestView Administrator

