



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 today to share my concerns over the Pennsylvania Department of Health's proposed changes in requirements for staffing in skilled nursing and nursing care facilities in the Commonwealth. While we agree in the theme of what this proposal, Regulation #10-224, 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 requirements, including equating 4.1 nursing hours per patient (resident) day and requiring full-time social workers for all nursing centers, will create an undue burden on our operations and likely will negatively impact our financial resources in a multitude of ways, including the increased reliance on expensive agency staffing during this historically challenging labor market.

Bethany Village's skilled nursing neighborhood is a part of the larger Asbury Communities organization, that has five community living campuses in Pennsylvania serving about 2,100 total residents and 330 who reside in Nursing Care Centers, including more than 70 we serve in our Nursing Care Center here at our award-winning community in Mechanicsburg, just miles from the state capitol.

The DOH knows firsthand the quality of work we have done throughout the pandemic. Just last August, our community's outstanding track record of safety during the pandemic was lifted up and recognized by the Pennsylvania DOH and we were selected as your announcement site for a press conference with Executive Deputy Secretary Keara Klinepeter about regulations for employee vaccinations at long-term care communities. The DOH was particularly impressed at Bethany Village's associate vaccination rate and complimented us on our efforts.

As Secretary Klinepeter saw up close that day, we do sacred work, and we have performed well despite the multiple and varied challenges through the pandemic. Additionally, as you know, 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 these factors lead us to not support this proposed Regulation #10-224 as it stands now.

Sincerely,

Brian D. Grundusky, MHA, NHA
Executive Director
Bethany Village