



June 23, 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 to express my concern over the Department of Health's proposed changes in staffing requirements for skilled nursing facilities. While ensuring that the residents we serve are receiving quality care is an absolute priority, this proposal's significant increase in hppd does not take into consider the staffing challenges long term care continues to endure.

The proposed staffing requirements will place an even greater challenge on providers who are already doing everything they can to recruit staff to fill vacant positions. Staffing challenges are wide spread throughout our state and continues to be a huge concern among senior living communities. Asbury Springhill is one of many communities that has been forced to use agency coverage for open positions so that we can maintain our quality standards and continue to provide exceptional care to those we serve. As a member of Asbury Communities, we are 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. Locally, we serve 80 residents in our Nursing Care Center here at Asbury Springhill. We have been greatly impacted by the shortages, the use of agency, and the financial implications associates with this.

If the proposed hppd of 4.1 were to go into effect in the very near future, one of the only ways to meet this expectation would be to decrease our bed capacity and limit admissions into our Health Care Center. Asbury Springhill participates in Medicare and Medicaid. Our current Medicaid reimbursement is not enough to currently support the care needs of residents. Under this proposal, the increases and funding support will be used for the proposed staffing requirements. This will add to the financial impact and challenges already facing us.

We strongly support quality care and appropriate staffing. However, we cannot support this significant change proposed in Regulation #10-224 as it stands now.

I am asking you to reconsider this proposal to align it with a more realistic staffing ratio that promotes quality while supporting the providers of care to continue to do the sacred work of caring for this vulnerable population. Thank you.

Sincerely,

Jane E Gibson

Jane E. Gibson, RN MSN NHA
 Springhill Executive Director