



**From:** [Constantino, Mark E.](#)  
**To:** [DH.LTCRegs](#)  
**Subject:** [External] Proposed Regulation - please do not impose!  
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Pennsylvania Department of Health  
301 Kline Village  
Harrisburg, PA 17104

Dear Official:

I am writing on behalf of Heritage Ministries, which operates Rolling Fields Elder Care Community in Conneautville, to express my strong opposition to the proposed regulatory change that would require nursing facilities to provide at least 4.1 hours of nursing care per resident per day. Given the current staffing crisis in nursing and every industry, meeting this mandate would place an unsustainable financial hardship on Heritage Ministries.

Rolling Fields and all Heritage Ministries facilities are committed to providing outstanding quality care. I have seen the steps the organization has taken during these very difficult past two years to ensure that it continues to do just that for every resident. Heritage Ministries has provided salary increases to staff in each of the last two years, employee health and mental wellness services, incentive programs, increased PTO, and more to help with staff recruitment and retention. And as a not-for-profit nursing home organization, Heritage pays the costs for more than 50 percent of its residents through its benevolence and will not turn away residents.

All of this requires much more money than Heritage takes in from state reimbursement rates. Penalties that Heritage would incur from not meeting the 4.1 hours of nursing care under the proposed regulations is simply not practical. Without additional funding from the state and other support, Heritage will not be able to meet this threshold. This imposed regulation could force the organization to close Rolling Fields. Presently Rolling Fields provides care for 108 residents. The proposed staffing mandate would require reducing the census to less than 75 residents, which is not operationally sustainable. Rolling Fields already operates at a much reduced census to maintain the current minimum staffing requirement. The current minimum staffing regulations currently limits our current capacity to 108 residents even though we are licensed to accommodate 181 residents.

Rolling Fields provides vital services to its residents, families, and communities and employment opportunities to its staff. I would like to see the Department of Health work with organizations like Heritage to prioritize finding solutions for seniors over penalizing nursing facilities. Please do not allow these regulations to be approved.

Regards,

Mark Constantino, VP of Quality and Clinical Operations  
Heritage Ministries  
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