



From: [Lisa Haglund](#)
To: [DH, LTCRegs](#)
Subject: [External] External Proposed Regulation
Date: Monday, June 27, 2022 6:53:22 PM

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As President and CEO of Heritage Ministries, which operates Rolling Fields Elder Care Community in Conneautville, I am strongly opposed to the Pennsylvania Department of Health's proposed regulatory change that would require nursing facilities to provide at least 4.1 hours of nursing care per resident per day. As the operator of adult care facilities in a neighboring state with an even lower minimum staffing standard, I can tell you firsthand the challenges of meeting these mandates. Today I make the same request of the commonwealth of Pennsylvania as I have of the state of New York: please start putting solutions for seniors ahead of penalties for nursing homes.

Heritage Ministries is committed to providing outstanding quality of care and we're proud of our record over these past two very difficult years. At the same time, it's simply not possible to meet this proposed requirement at a time when our industry—and the entire country—is experiencing a labor shortage and other challenges exacerbated by the global pandemic.

Maintaining quality of care with our existing staff is a day in day out challenge, but research indicates the problem will only get worse. According to a recent Mercer study, [featured in the Pittsburgh Post-Gazette](#), Pennsylvania will lead the nation in nursing shortages by 2026. Mercer projects the healthcare industry in Pennsylvania will be short more than 20,000 nurses by then – and that's not even taking minimum staffing mandates into consideration.

Recognizing that staff shortages and high turnover rates are often attributed to low wages, Heritage has demonstrated a commitment to our dedicated staff. Not only have we provided salary increases in each of the last two years, we've also supported our workforce with health and mental wellness services, incentive programs and increased PTO. We're doing all we can to focus on employee retention while still actively recruiting in a very shallow pool of candidates.

Despite our daily staffing challenges, and a pandemic which still refuses to loosen its grip, Heritage Ministries prides itself on not turning away residents. However, this proposed lower minimum staffing requirement puts our facility, and many like it, at a crossroads. Reducing our census may be our only option to meet your stringent standards. But being forced to turn our back on a community in need is not a decision we want to make.

Before you review this regulation, I hope you'll consider visiting Rolling Fields. We would welcome the opportunity to introduce you to our dedicated staff. Seeing the tremendous lengths we take to provide quality care with our existing staff will help you better understand that now is the time to think proactively, not punitively.

Sincerely,

Lisa Haglund
President and CEO, Heritage Ministries

Thanks, Lisa