



From: [Edward Brubaker](#)
To: [DH, LTCRegs](#)
Subject: [External] Comments on Proposed Nursing Facility Regulations
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Good evening,

I am Edward Brubaker, President and CEO of Living Branches, a retirement community system in southeastern PA with three campuses. We have two Life Plan Community campuses and one personal care campus. On our Souderton Life Plan Community campus we have a nursing center with 71 beds and on our Dock Woods Life Plan campus we have a nursing center with 72 beds. We are known in our local community to give excellent care and recently had a deficiency free survey on our Souderton campus.

We have very serious concerns about the proposed regulations, which can be summarized in the following points:

- First, we provide quality care at a staffing level of less than 4.1 hours per resident day at the present time. Since the state has not increased our reimbursement levels for many years, private pay residents would bear the cost of any proposed staffing increases. Medicaid does not cover our current costs, the gap would be larger with the proposed staffing changes.
- Second, we cannot find enough staff to fill our current CNA openings. We are unsure how an unfunded mandate to require us to hire more staff will alleviate this issue, in fact, it will only make a bad situation worse. We currently fill the gap with agency staff, which are very, very expensive. That approach is not sustainable nor does it provide the care that our residents deserve.

I could elaborate for many pages as to why this change is a bad idea; for our residents, for our industry and for the state. However, the above points succinctly summarize our concerns. We provide good care for less than 4.1 hours per resident day (we do staff well above 2.7 hours). There are no CNA's out there for hire so we need to train them (we have a training program in our organization). Mandating more staff, particularly with no increase in reimbursement, will not change this situation.

I would invite you to visit our community, to hear from CNA's about their work and why they love the persons they serve. They would all love to be paid more for what they do (and we would love to pay them more), however, the current system does not allow for that. The proposed regulations will do nothing to change the core issues, low wages and very few persons pursuing this as a career. Let's work together to find a better solution that is fair to all concerned.

With kind regards,

Edward Brubaker

Edward D. Brubaker
President/CEO

Living Branches

242 West Reliance Road, Souderton, PA 18964

O: 215-368-4438 ext. 44408

Edward.Brubaker@LivingBranches.org

<https://livingbranches.org/>

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