



Pennsylvania Department of Health  
Office of Policy  
Health and Wellness Building  
625 Forster Street, Room 814  
Harrisburg, Pennsylvania 17120  
27 June 2022

Attention: Ms. Lori Gutierrez, Deputy Director

Dear Ms. Gutierrez,

After a careful review of the specifics, components and likely impact of proposed legislative changes, we are writing in strong opposition to the Department of Health proposal to increase the staffing requirements from 2.7 hours per patient day (ppd) to 4.1 hours on each shift, a concept that we believe will have a demonstrable negative impact upon the communities we operate and the residents we serve.

Our objections are based upon our nearly century long experience as a provider of services to the elderly as well as a wealth of documented research demonstrating that scant correlation exists between higher staffing levels and increased quality of care. Indeed, a review of the Centers for Medicare and Medicaid's Five-Star Quality Rating System displays countless communities throughout the Commonwealth with higher staffing ratings, yet low results in quality measures, survey outcomes and resident satisfaction.

The federal government is undoubtedly aware that staffing ratios do not solely equate with increased quality as they have chosen not to mandate a minimum staffing hour ppd. They recognize that each nursing home has unique qualities such as the acuity of their residents, characteristics of the community and the training, competency and tenure of the staff as the real components that determine quality care. Their approach in using the facility assessment and resident care plan to determine appropriate staffing levels would be more effective in improving quality rather than an arbitrary staffing number.

Perhaps the most troubling aspect the Department's proposal to raise staffing requirements will be the unfair impact upon rural nursing homes. While all communities struggle to find dedicated and compassionate and caring associates during the worst staffing crises of our time, nursing homes located in rural, less populated areas have everyday challenges in hiring owing to their physical location and lack of population. An inordinate staffing increase upon these small community nursing homes, whom in many cases have the best quality surveys in the state, will undoubtedly have a devastating impact.

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One can only imagine the unintended consequence when these and other nursing homes are unable to recruit staff at any cost to meet the proposed increase in pdd staffing, namely, the closure of communities, the relocation of residents and the associated decrease in quality of care. Will a resident whose community is unable to meet subjective staffing levels potentially be forced to move a great distance away from family support when they cannot find the extra staff to meet an arbitrary fifty percent increase in pdd staffing?

It is commendable for the Department to focus on improving the quality of care of the citizens residing in our nursing homes and one appreciates your mission in this regard, however, the inadvertent negative impact of the proposal to radically raise staffing requirements far outweighs the suggested benefit. We sincerely believe that our residents and those across the Commonwealth will be better served with a moderate staffing increase that is based on proven components that lead to increase in quality care, including results in quality measures, survey outcomes and resident satisfaction.

Sincerely,

Presbyterian Senior Living