



From: [Jennifer Stewart-King](#)
To: [DH, LTCRegs](#)
Subject: [External] Comment for Proposed Changes to Long Term Care
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Attachments: [CMS commentIndependent Regulatory Review Commission.docx](#)

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Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, PA 17101

RE: Rulemaking 10-221 Proposals for Long Term Care

Dear Sir or Madam,

My Name is Jennifer D. Stewart-King and I am the Nursing Home Administrator for Gracedale Nursing Home – County of Northampton. This letter is to review some of the proposed changes that the PA DOH would like to make when it comes to Long Term Care.

I have worked in the industry since 2005 and since then have seen many changes. What was once a robust workforce no longer exists, we have entered an existential crisis. Staffing numbers have been dropping for more than a decade and since the pandemic, staffing has been crippled. We at Gracedale have tried many initiatives to entice people into the nursing home for a career choice. Caring for people is a tough job but very rewarding.

My colleague and I met with some Senators approximately a year ago to discuss the increase to the PPD numbers and its effect. The rapid increase to 4.1 PPD will be detrimental for the entire Long Term Care landscape and will have rippling effects into all of healthcare (hospitals, assisted livings, Doctor's Offices and Families). We offered a plan to increase PPD over 5 years. This would allow a joint effort between LTC, Nursing schools, DOH, the PA congress to figure out increased funding, get more students through programs, allow a greater number of staff to be included in the PPD calculations.

The proposal of DOH with minimal numbers of nursing staff is obsolete. There are several members on a Resident's team that support their care and are not considered in the current PPD number calculations. You need to include the time a Social Service Coordinator spends with a Resident. This time directly affects the Resident's mental health, personal choices. There is the Activities or Therapeutic Recreation staff that do a number of 1:1 activities with a Resident for a substantial period. Physical, Occupational and Speech therapy should also be considered in the PPD numbers as the spend time with the Resident's to ensure they are at their highest quality of life potential.

Funding also needs review. We currently get approximately \$221.92 per day to care for a Resident under the Medicaid rate. This number is far below what we spend to provide quality care. We are the Home where people come for Long Term Care. They spend their end of life with us, we need to care for them and be here for future Residents.

Thank you for taking your time to read and understand that we as Administrator's only want the best for our Residents.

Sincerely,
Jennifer D. Stewart-King

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