November 25, 2020

The Honorable Rachel Levine, Secretary
Pennsylvania Department of Health
Delivered Via Email

Dear Secretary Levine:

On behalf of the Delaware Valley and Greater Pennsylvania Chapters of the Alzheimer’s Association, I am writing to ask for your review and consideration of the “Recommendations to Improve Pennsylvania’s Nursing Facility Regulations” submitted by CARIE, Community Legal Services, and other leading advocacy organizations on November 23, 2020. Our two Chapters combined represent nearly 400,000 Pennsylvanians living with Alzheimer’s or other dementia, 677,000 Pennsylvania unpaid caregivers, and countless other families and friends who are impacted by this disease. With nearly half (48%) of all nursing home residents living with Alzheimer’s or other dementia, we are committed to advocating on their behalf to ensure they receive high quality care while preserving their overall health, safety and well-being.

The Alzheimer’s Association believes that person-centered care is the foundation of quality care across all long-term care settings and the above recommendations are grounded in this principle, along with other important health and safety measures aimed to improve the overall quality of life for all nursing home residents. We understand the Department has been working to update the nursing home regulations over the past several years and intends to publish these updates in near future for public comment. Prior to doing so, the Association requests the Department’s consideration of these recommendations, and would like to further underscore a key priority area for the Alzheimer’s Association included in the recommendations around dementia training.

Alzheimer’s and other dementias require a wide range of evolving care and services, and as the disease advances individuals often need more specialized care. Professional care staff play a critical role - one of which has become even more elevated during the last nine months of the COVID-19 pandemic - in the lives of dementia residents by helping shape their daily lives and assist with all aspects of physical care for those living with the disease. A cornerstone of providing quality person-centered dementia care is to ensure that all professional care staff involved in the delivery of care to people with dementia receive dementia-specific training and demonstrate an ability to: provide person-centered dementia care; communicate with individuals with Alzheimer’s; address behavioral symptoms, including alternatives to physical and chemical restraints; and address specific aspects of safety, such as wandering. Enhanced training is a win-win-win, benefitting staff (decreases stress, burn-out, turnover and increases job satisfaction), residents (improved quality of care and quality of life outcomes) and providers (improved resident outcomes, less adverse events and health-related deficiencies and better staff retention) in a number of meaningful ways, all of which further support efforts to navigate the current pandemic and future emergencies.
The COVID-19 pandemic has undoubtedly tested every fiber of the Commonwealth’s public health infrastructure. Unfortunately, Pennsylvania - like most other states - was not well-equipped to protect the most vulnerable population of residents living in long-term care settings, which underscores an urgent need for Pennsylvania to move forward with updating its nursing home regulations, including the recommendations outlined above. The Alzheimer’s Association extends our profound appreciation to you, your Executive Team and all the staff at the Department who are working around the clock to protect the public’s health during these very challenging times. We remain committed to working together with you throughout the pandemic and other emerging issues, and appreciate your review and consideration of these important recommendations as part of the Department’s full nursing home regulation updates. Please do not hesitate to contact me directly at jaebersole@alz.org or (717) 364-9102 if you have questions or would like additional information.

Sincerely,

Jennifer Ebersole
Director of State Government Affairs
Alzheimer’s Association