

Logan Manor Community Health Services

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March 25, 2021

Dear public health and welfare committee,

My name is Teresa McComb and I am the Administrator of a small city owned nursing home in rural Kansas. I would like to voice my concerns surrounding SB 303. It is my understanding that this bill would require city and county owned nursing homes to allow visitation through a public health emergency. I have many concerns about this bill due to the fact that our rules are set by CMS and KDADs and this bill would be forcing us to not only ignore but to completely go against the regulations that have been set forward for us.

Our nursing home funded primarily by Medicare and Medicaid. Over 70% of our income comes from these sources. If we were to not comply with CMS guidelines we would be in a position where fines would be imposed upon us and our Medicare and Medicaid licenses could be revoked. We are surveyed by KDADs annually to ensure that we are following CMS and KDADs guidelines. In 2020 they added another infection control survey that was done at each facility in the state a minimum of once. Our facility had an infection control survey twice. If we were found to be out of compliance at any of these surveys KDADs and CMS would issue a deficiency and follow up to ensure that we corrected the deficient practice. If we allowed visits during a time that we were told not to we would have been issued a deficiency. If we didn't correct the deficient practice we would be issued a fine that could rapidly add up to a high sum of money as their fine schedule is by the day the deficient practice occurred. If we continued to not get into compliance with CMS and KDADs we would ultimately end up closing the facility down as the fines would get higher and we would no longer be able to receive Medicare and Medicaid residents.

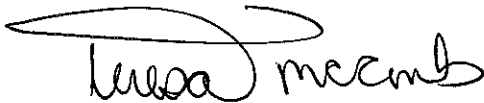
Through many months of the COVID pandemic CMS guidelines prohibited visitation due to the risk of bringing COVID into a very vulnerable population. In March of 2020 our doors were locked and visitors were not permitted to enter with the exception of end of life visits. It wasn't until September of 2020 that CMS revised guidance to allow for certain types of visits in nursing home facilities in certain situations. To allow visits the county positivity rate had to be below a certain level and there could not be any active breakouts in the Nursing home among other regulations. When this guidance came out our facility was able to allow supervised visits with a screening process in a certain area of the nursing home. After a couple weeks we had to cease the visitations as our county positivity rate climbed. We were only able to resume these supervised visits about 3 weeks ago when our county finally turned from

red to yellow on the KDHE Covid map. On March 10th 2021 the CMS guidance was revised to add some information for vaccinated residents having visits. We have slowly been able to open and allow unsupervised visits to occur in the rooms. We are gaining ground and hope to continue to be able to allow visitors.

Through the months when we were not allowed to have visitors in the facility the staff all pulled together and worked hard to ensure that our residents still had the best quality of life possible. We utilized zoom, facetime and messenger video to allow families to be able to video chat with their loved ones. We allowed families to come to the windows and talk to their loved ones through the windows. We used our large computer system to have activities with daycare kids and school kids. We have had the daycare kids come to the windows for activities such as Pictionary and tic tac toe. Church services have been available through zoom. These are just a few of the things we have thought of to make the months of quarantine bearable.

Personally I am not sure if it was the best thing to keep visitors out of the facility. I believe the residents should have had a voice and have been able to help make the decision about visitation rules. I have seen a higher rate of depression in the residents through the lock down. However, we live in a society where our rules are dictated by a government agency and we are required to comply. The passing of SB 303 would ultimately result in Logan Manor closing down. This would be devastating to the community for many reasons. The first reason is our residents would have to be sent to larger facilities over an hour away. Family members who live in the area wouldn't be able to come to the windows to visit through the bad times. It would also eliminate the largest employer in our small community. We employ 50 people who would have to start commuting to another job or leave the area all together. Our small town would not be the same without the nursing home.

Sincerely,

A handwritten signature in black ink, appearing to read "Teresa McComb". The signature is fluid and cursive, with a large loop at the beginning.

Teresa McComb
Administrator

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