

Comments on Draft Regulations COMAR 10.24.01 and 10.24.20

I served on the MHCC Nursing Home Acquisition Work Group as a representative of Marylanders for Patient Rights, and I am an expert in Microbiology (Ph.D. from U. of Southern California).

I am very supportive of COMAR 10.24.01 which provides the needed level of transparency to residents and their family, and the public.

I have several comments, however, on 10.24.20.

It is absolutely critical to reduce the number of beds to no more than two residents per room as soon as possible for infection control. This is supported by well-established basic microbial science dating as far back to the 1800s with Louis Pasteur. The “germ theory” was confirmed by the spread of the highly infectious flu in 1918 within the close ranks of military personnel, and legions of other epidemics. Sharing bedrooms and bathrooms with more than two roommates increases infection risk to residents and staff.

Page 24 b(i) Inspections.

Assumed oversight by OHCQ is concerning. The agency has a history of insufficient oversight of nursing homes, recently resulting in a lawsuit by seriously neglected nursing home residents. Who will actually implement and enforce inspections? This question is at the heart of successfully protecting nursing home residents.

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Why not include availability of COVID vaccinations, along with flu and pneumonia? After over 200,000 deaths from COVID in nursing home residents and staff, it is vital that COVID vaccines are made readily available to residents.

Overall, I think the updated regulations will have a very positive impact on management of our nursing homes and protection of vulnerable residents, and I am grateful to the MHCC for their leadership.

Thank you for considering my comments,

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