

GRIEVANCE PACKET

Opposing the Repeal of Mandatory Minimum Staffing Requirements for Long-Term Care Facilities

INSTRUCTIONS FOR USE:

1. Decide which oversight authorities to notify. You may send this grievance to any or all of the federal and state offices listed below.
2. Before the body of the letter, write your full name, mailing address, city, state, ZIP code, email address, phone number, and the date.
3. Attach any supporting documentation such as inspection reports, hospital transfer logs, care plans, correspondence, or photographs.
4. Send the grievance by certified mail and, where available, by email or official online complaint portals. Keep copies of everything.
5. You may share this grievance publicly to increase accountability and allow advocates, residents, and families to adapt it.

PRIMARY FEDERAL OFFICES FOR SUBMISSION

CENTERS FOR MEDICARE & MEDICAID SERVICES (CMS)

Physical Address:

Centers for Medicare & Medicaid Services

7500 Security Boulevard

Baltimore, MD 21244-1850

Email:

CMSAdministrator@cms.hhs.gov

Online Portal:

<https://www.medicare.gov/claims-appeals/filing-a-complaint>

U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES (HHS)

Physical Address:

U.S. Department of Health & Human Services
200 Independence Avenue, SW
Washington, DC 20201

Email:

HHSExecSec@hhs.gov

Online:

<https://www.hhs.gov/complaints>

OFFICE OF INSPECTOR GENERAL (OIG)

Physical Address:

U.S. Department of Health & Human Services
Office of Inspector General
ATTN: OIG Hotline Operations
P.O. Box 23489
Washington, DC 20026

Email:

spoof@oig.hhs.gov

Online Portal:

<https://oig.hhs.gov/fraud/report-fraud/>

GOVERNMENT ACCOUNTABILITY OFFICE (GAO)

Physical Address:

U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Online Reporting:

<https://www.gao.gov/reportfraud>

STATE-LEVEL SUBMISSIONS

Send copies of this grievance to:

- State Department of Health – Long-Term Care Regulation Division
- Governor’s Office
- State Attorney General – Medicaid Fraud or Consumer Protection Unit
- State Long-Term Care Ombudsman
- State Senators and State Representatives

FACTUAL SOURCING

This grievance relies on:

- CMS Staffing Study (2022-2023), PBJ data
- OIG nursing home audits
- GAO reports (2019-2023)
- NASEM 2022 “National Imperative to Improve Nursing Home Quality”
- Peer-reviewed medical studies (JAMA, NEJM, Health Affairs)
- 1987 Nursing Home Reform Act

GRIEVANCE LETTER

To Whom It May Concern:

I am filing this formal grievance to oppose the repeal of mandatory minimum staffing requirements for long-term care and skilled nursing facilities. This repeal conflicts with extensive federal findings from the Centers for Medicare & Medicaid Services, the Department of Health & Human Services, the Office of Inspector General, the Government Accountability Office, the National Academies of Sciences, Engineering, and Medicine, and peer-reviewed clinical research. These authorities have consistently concluded that inadequate staffing is a leading cause of preventable injuries, regulatory violations, hospitalizations, and excess mortality among long-term care residents.

Federal oversight reports have established that:

- A substantial majority of facilities do not maintain staffing levels sufficient to meet residents' needs, as shown by CMS Payroll-Based Journal data.
- Understaffing is associated with sepsis, pressure ulcers, malnutrition, medication errors, falls, aspiration, and death, according to GAO, OIG, and clinical studies.
- CMS has recognized staffing levels as one of the most critical factors determining resident safety.
- The National Academies have described chronic understaffing in nursing homes as systemic, dangerous, and incompatible with safe care.

The repeal of staffing floors:

- Reintroduces conditions known to cause preventable harm.
- Undermines compliance with federally required quality-of-care standards for Medicare and Medicaid-participating facilities.
- Predictably increases infections, untreated chronic conditions, malnutrition, and premature mortality.
- Shifts avoidable financial burdens onto Medicare and Medicaid through preventable hospital transfers.

REQUESTED ACTION

I respectfully request:

1. Immediate reinstatement of mandatory minimum staffing standards.
2. Public release of all internal documents used to justify the repeal.
3. Enhanced oversight for facilities with chronic understaffing or a history of related deficiencies.
4. A review by the Office of Inspector General or Government Accountability Office of the harm resulting from the repeal.
5. Public hearings allowing residents, families, staff, and experts to provide testimony.

CONCLUSION

The repeal of minimum staffing protections places elderly, disabled, and medically fragile residents at predictable and preventable risk. These residents are entitled to safe, adequate care consistent with federal standards. Immediate corrective action, full transparency, and a written response are requested.

Respectfully submitted,

Signature

Printed Name