



From: [Ziegler, Marjorie](#)
To: [DH, LTCRegs](#)
Subject: [External] RE: Rulemaking 10-221 (Long-Term Care Facilities, Proposed Rulemaking 1)
Date: Friday, August 13, 2021 4:45:58 PM

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To Whom It May Concern,

Please accept this letter of comment on the recently proposed rule, "Department of Health, Title 28. Health and Safety, Part IV. Health Facilities, Subpart C. Long Term Care Facilities, 28 a. Code 201.1-201.3:211.12(i), Long Term Care Nursing Facilities".

This letter is being sent on behalf of the residents we serve and the direct care staff of Crestview Center. Our nursing facility is a 180 bed facility located in Bucks county, Langhorne, pennsylvania. We employ 190 employees and provide services to 151 residents. As the Center Executive Director, I can attest to our facilities commitment to providing high quality care and prioritizing the needs of the residents we serve each and every day..

After reviewing the proposed regulation, we have grave concerns regarding the amendments to increase the required minimum number of hours of general nursing care from 2.7 to 4.1 hours for each resident and excluding other direct care provided by essential caregivers.

Crestview is currently experiencing challenges with workforce availability, funding challenges, agency staffing issues, competition with other workforce markets and geographic location. We continue to diligently utilize recruitment strategies, retention strategies, and incentive programs as hiring tools. The amount of direct care provided at Crestview, that is not considered general nursing, is tremendous and very essential, and should be factored into the state's staffing minimums. Crestview provides physical therapists, occupational therapists, speech therapists, dieticians, wound care nurses and activities directors, all of which is not considered direct care.

The Crestview Team and Residents are proud of our facility. Please recognize that raising the general nursing care from 2.7 to 4.1 hours is not sustainable.
Respectfully,

Marjorie Ziegler, CED

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