



From: [NANCY BULLIVANT](#)
To: [DH, LTCRegs](#)
Subject: [External] Concerns with DOH Proposed Nursing Facility Regulations
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Good morning.

My name is Nancy Bullivant RN BSN NHA, working in the capacity of the Senior Director of Health and Wellness at Morningstar Senior Living in Nazareth Pennsylvania.

Our community is a CCRC with a 60 bed licensed skilled nursing community certified for both Medicare and Medicaid services.

We have continued to operate as a 5-Star community and currently have 5-stars in all our quality measures.

As we look at the proposed staffing regulations, we have concerns about being able to maintain the staffing needed to provide the high quality of care that we and our seniors are accustomed and deserve to receive.

RNs, LPNs as well as Certified Nursing Assistants are very difficult to hire and retain in this environment. Many decide to look for a Perdiem status so that they are able to pick up premium rates at multiple communities or due to the need and cost of child care services.

Staffing with agency employees is already a must and the need to increase that creates a concern in maintaining consistent, desired care for those we serve.

We have continued to increase pay rates and offer incentives, yet the current environment is not conducive to hiring. There are on-going restrictions with Covid testing and vaccinations that continue to keep many away from this opportunity of employment. Time is needed to increase stability and build the workforce back up to a standard that is able to meet the need.

The goal to be able to provide clinical care plus person centered programming

such as music, games, activities and an individual meal/snack choice offering will be impeded by this regulation.

Costs are close to \$100,000 per month for agency staff and adding to that, the decrease in reimbursement to the PDP rate and the minimal increase in payments to care for Medical Assistance residents, will create a significant increase in financial hardship.

Costs can significantly impact the number of individuals we are able to care for appropriately which will further decrease reimbursement as we have to reduce census.

We are looking to care for the most vulnerable of our citizens who have put their life into continually building our country. They deserve to have care that is dignified, comfortable and respectful.

Please review carefully these regulatory proposals to enter changes at a pace that coincides with the environment we are in related to employment, inflation and reimbursement.

Thank-you for taking time to review and consider other options to the proposal.

Nancy Bullivant

Senior Director Of Health And Wellness



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Five Star Rating | Centers for Medicare & Medicaid Services

Best Continuing Care Community | The Morning Call's Readers' Choice Awards

Best Nursing Home 2020-21 | U.S. News & World Report

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