

## **Other Written Comments/Inquiries to 06/11/2025 APH Regulations Stakeholder Meeting**

### **Stakeholder 1**

James Shannon RN JD MHSA CPHQ  
Department of State Hospitals  
Nurse Consultant I, Statewide Quality Improvement Division

### **Stakeholder 1 Comment**

Good afternoon,

Thank you for your time. As you may be aware, the State of California's Department of State Hospitals is composed of 5 state-licensed acute psychiatric hospitals. Attached, please find the Department of State Hospitals comments regarding the questions posed during last week's all-stakeholders call regarding the proposed emergency regulations for nurse-patient staffing ratios at acute psychiatric hospitals.

Thanks again,

**Hyperlink to CDPH APH Website:** [DSH Stakeholder Comments in Response to AFL 25-18 \(PDF\)](#)

### **Stakeholder 2**

Jeremy F. Baker, MHA, FACHE, CPHQ, HACP, CPHRM, LSSBB  
Providence | South Division  
Executive Director, Quality, Risk Management, Patient Safety & Regulatory

### **Stakeholder 2 Comment**

Just a comment we would like to offer is any consideration to ensure that Title 22 staffing requirements for this area take into consideration staffing requirements under Title 9, Section 663: [View Document - California Code of Regulations](#)

This may require some discussion with DHCS, and although we understand that there are two separate agencies involved and two separate regulations, many of the inpatient psych facilities that are designated under the LPS act do have requirements placed on them by DHCS to follow the Title 9 staffing requirements. This often creates conflicting staffing requirements between the two regulations as some of these inpatient LPS facilities are licensed as part of GACHs under CDPH's jurisdiction.

Thank you for your consideration.

### **Stakeholder 3**

Carmen Comsti  
California Nurses Association/National Nurses United  
Assistant Director of Government Relations

**Stakeholder 3 Comment**

Dear Deputy Director Posner,

Please find attached written comments from the California Nurses Association in response to the questions by CDPH in the June 11, 2025, Stakeholder Meeting on acute psychiatric hospital nurse-to-patient staffing ratio regulations.

If there are any questions, please reach out to me or Puneet Maharaj CNA Director of Government Relations.

**Hyperlink to CDPH APH Website:** [California Nurses Association Letter - June 16, 2025](#)

**Stakeholder 4**

Kirsten Barlow, MSW  
California Hospital Association  
Vice President, Policy

**Stakeholder 4 Comment**

On behalf of more than 400 hospitals and health systems, including 32 free-standing acute psychiatric hospitals and 72 general acute care hospitals with psychiatric units, the California Hospital Association (CHA) offers the attached recommendations on acute psychiatric hospital staffing regulations being developed by the CA Department of Public Health.

CHA would appreciate the opportunity to answer any questions you may have and to discuss our recommendations with your team.

Thank you,

**Hyperlink to CDPH APH Website:** [California Hospital Association Letter - June 16, 2025](#)

**Stakeholder 5**

Jack Lungu, RN, MBA  
Adventist Health  
Administrative Director, Behavioral Health

**Stakeholder 5 Comment**

Thank you very much for taking time out of your busy day to listen to us on this important topic that will shape the care that our community will receive in psychiatric hospitals. Attached are a summary of my points today.

Regards,

**Hyperlink to CDPH APH Website:** [Adventist Health Letter - June 16, 2025 \(PDF\)](#)