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806 Foulkeways

Gwynedd, PA



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Lori Gutierrez, Deputy Director  
Office of Policy  
Pennsylvania Department of Health

**Re: DOH Pennsylvania Nursing Facility Licensure Regulations to 28 PA.  
Code 201 and 211 to Federal Code 42 CFR Part 483**

I write to again raise serious concerns about the proposed licensure regulation. The requirement that all nursing facilities in Pennsylvania abide by federal Medicare regulations re documentation of care via the MDS for Medicare is a broad sweep which does not allow for circumstances where the facility receives NO Medicare funding. This is the situation at Foulkeways where my husband and I are residents.

In 2017, after careful study, Foukeways at Gwynedd made the decision to withdraw from the Medicare funding program in order to spend the money it was costing for this documentation on actually providing patient care.

In January of this year my husband became ill and now resides permanently in Foulkeways at Gwynedd's skilled nursing facility, "Gwynedd House." The care he receives is individualized to meet his very complex needs. Staff are well trained, patient and consistent in their approaches and we continue to be grateful for our decision in choosing to live at Foulkeways because of the reputation of excellent care. As a nurse, I believe that the quality of health care through episodes of illness and in decline is the most important criteria in selecting a long term care facility. I have never regretted this decision and am gratified that our Skilled Nursing facility in the DOH survey this year was found deficiency free.

Long experience in the nursing profession both in practice and as an educator made me well aware of the importance of good documentation. At the same time, I have seen how an approach which imposes onerous time consuming and tedious regulations on professional staff is both demoralizing to staff and takes valuable time away from care. Our profession is in a crisis to recruit and retain adequately educated nurses. The need to satisfy the specific approaches to documentation proposed in these regulations will require hiring of a specific RN to complete Medicare paperwork and certify accuracy for payment we do not receive. It will increase costs at Foulkeways and ultimately those of us who reside here, as our small 55 bed Nursing Faciity is funded by the residents.

Please ensure that Foulkeways at Gwynedd is exempt from any federal Medicare regulations imposed by the state.