



**From:** [Cynthia Lev](#)  
**To:** [DH, LTCRegs](#)  
**Subject:** [External] Comments on proposed DOH changes to PA Facility Licensure Regulations (28 PA Code 201 and 211 Federal Code 42 CFR Part 483)  
**Date:** Saturday, October 22, 2022 11:50:22 AM

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To the attention of: Lori Gutierrez, Deputy Director, Office of Policy

My husband and I moved to Foulkeways Life Care Community in Gwynedd, Pennsylvania, in 2016. Our decision was based in large part on the quality of health care services available to residents in Gwynedd House, Foulkeways' skilled nursing facility.

Foulkeways has a small—52-bed—nursing home which has consistently offered excellent care to residents for many years. In 2017 the Foulkeways Nursing Facility made the decision to withdraw from the Medicare program to allow nursing staff to focus on *providing patient care* rather than managing paperwork.

In the intervening five years I have personally seen many, many of my dear friends and neighbors here at Foulkeways benefit from the excellent nursing care they receive in Gwynedd House, even with the additional challenges presented by the Covid pandemic and related staff shortages. I am grateful Foulkeways has been able to make the quality of nursing care their top priority. I see it myself every time I visit a friend in Gwynedd House and only hope this same quality of nursing care will be available to me and my husband when we need it.

I support the need for government oversight of nursing homes and the care they provide. However, since our Nursing Facility at Foulkeways (Gwynedd House) **receives no funds from Medicare or Medicaid**, the proposed regulations will still require Foulkeways to divert critical funds and nursing staff/time to completing paperwork requirements *for funding we are not requesting and do not receive*.

These proposed changes will have a very negative impact on me and my husband and the other residents at Foulkeways. We are a **small, self-funded community**, and the additional costs involved with compliance **will be born by all of us entirely**, creating a very real financial burden on people like us with fixed incomes who are already facing inflation and fluctuating market conditions. In addition, my fear is that rather than enhancing or assuring quality of care for Foulkeways residents, the proposed regulations may actually divert nursing

hours away from patient care and ultimately result in diminished quality of care for residents when we need it.

For these reasons, I strongly recommend that Foulkeways be exempt from Federal Medicare regulations imposed on us by the state of Pennsylvania.

Cynthia Levy

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