



October 24, 2022

Independent Regulatory Review Commission
Attn: Lori Gutierrez
Deputy Director
Office Of Policy

Re: Proposed Department of Health Pennsylvania
Nursing Facility Licensure Regulations to 28 PA
Code 201 and 211 to Federal Code 42 CFR
Part 483

Dear Ms. Gutierrez,

I am writing to urge that Foulkeways at Gwynedd be exempt from proposed Department of Health regulations that would conform PA regulations to Federal Medicare regulations for all skilled nursing facilities in PA, regardless of the PA facilities' participation in the Medicare program.

Foulkeways withdrew Gwynedd House (its skilled nursing facility) from Medicare participation several years ago, specifically to conserve precious nursing time for patient care rather than for onerous documentation and other requirements of the Medicare program. I speak from personal experience as a former patient and a retired health care professional in saying that this decision has in no way compromised the quality of care. I have lived at Foulkeways for nearly 10 years and on four recent occasions have been cared for in Gwynedd House for required post-hospital care. It would be an understatement to say that the care I received far exceeded my expectations! Foulkeways' recent deficiency free Department of Health survey gives further proof that Foulkeways does not need the oversight of Federal regulations in order to maintain high standards.

It is hard to imagine any justification for imposing these regulations on an already high-quality program. Compliance would impose an unfair and rather illogical financial burden on Foulkeways since additional staff would have to be hired to meet regulations that apply only to Medicare, a program in which Gwynedd House does not participate.

Thank you for your consideration of this urgent matter.

Sincerely,

//s//

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