



From: [Julia Rhoads](#)  
To: [Lori Guterrez](#)  
Subject: [Electronic Comments to Lori Guterrez, Deputy Director, Office of Policy](#)  
Date: Monday, October 24, 2022 11:06:31 AM

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Dear Lori Guterrez, As a resident of Foulkeways and a retired social worker, I volunteer time with patients receiving care in Gwynedd, our nursing facility.

As a clinical therapist I am aware of the careful documentation needed as part of care, and when on the floor here on Gwynedd we see the care with which records are kept. Clearly, in setting up the requirements for record keeping for the proposed changes are well intended, however, the time and energy required to meet the demands being proposed will greatly impact the quality of care given in the nursing facility here at Foulkeways.

My father in law was an respected professor of surgery at the University of Pennsylvania. At the end of his life he was hospitalized at the pavilion that bore his name where he received excellent care, attended by fellow professors of medicine and surgical and medical residents. Many of the nurses who had worked with him eagerly volunteered to take rotations in his care. This "duty" allowed them quiet hours in his room, where there was a family member present 24/7, so the nurse could attend to the medical paper work her other duties required. It was hard to comprehend how much time and energy was consumed in addition to the actual work given by each nurse.

Foulkeways is a small self funded facility, known for the excellence of care. Many schools that have students in many fields of care for the elderly regularly arrange for their students to spend time here as part of their training. I am sure Mary Knapp, our director of medical services, could provide the actual numbers of students who spend valuable experience for their training here at Foulkeways. If the time made available for providing these opportunities were restricted by time required for unneeded paperwork it would be a loss.

Onerous requirements for paperwork proposed by new regulations would diminish not only the level of care we offer, but negatively impact staff morale.

Respectfully submitted, Julia G Rhoads  
210 Foulkeways  
Gwynedd, PA 19436  
Sent from my iPad