



From: [Paula Cell](#)
To: [DH, LTCRegs](#)
Subject: [External] Proposed DOH Regulations to 28 PA. Code 201 and 211 to Federal Code 42 CFR Part 483
Date: Sunday, August 29, 2021 3:44:03 PM

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.

To: Lori Gutierrez, Deputy Director, Office of Policy

My husband and I have been residents at this "Life Planned Community" since 2008. During that time both of us have experienced serious illness, the aftermath of which was handled in a coordinated and humane way that would not have been possible were we not at an institution whose mission is to provide such care. When the administration decided in 2017 that the Medicare Part A regulations that reimbursed some patient care in the nursing home were onerous and took nurses to the computer rather than the bedside, it dropped out of the program. Since that time the care has remained excellent; the staff very stable; the reported regulatory ratings good to excellent; and the residents very satisfied that they are in good hands and lucky to be at Foulkeways. The usual yearly increases for residents have been very manageable, perhaps in part due to that decision.

If the Medicare standards are imposed which involve compliance with a significantly greater number and complexity of regulations, and the institution is not receiving reimbursement for that level of compliance, the requirement for non-Medicare participating nursing homes appears punitive. It seems likely that for us at Foulkeways, fees will have to go up because such compliance will affect staffing. It is highly unlikely that Foulkeways administration will sacrifice the quality of care by limiting nursing hours at the bedside for required paperwork.

Why, in the middle of the pandemic when nursing staff is stretched, is the State imposing additional requirements? Is there any evidence that such a change for non-Medicare nursing homes will improve care? Please reconsider this proposal.

Paula Cell
Foulkeways Resident