



**From:** [jcox6814@verizon.net](mailto:jcox6814@verizon.net)  
**To:** [DH, LTCRegs](#)  
**Cc:** [mary\\_knapp@foulkeways.org](mailto:mary_knapp@foulkeways.org)  
**Subject:** [External] Licensure Regulations proposed to 28 PA Code 201 and 211 to Fed Code 42 DFR Part 483  
**Date:** Friday, August 27, 2021 1:53:37 PM

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To: Lori Gutierrez  
Deputy Director  
Office of Policy

Ms Gutierrez:

We are writing as residents of Foulkeways at Gwynedd, a continuing retirement facility with nursing facility housed in Gwynedd House. We moved here because of the excellent reputation for care that Foulkeways has long held. As part of Foulkeways efforts to maintain high quality care and to provide that care with consideration of costs which are resident funded, the facility withdrew from the Medicare program in 2017. This withdrawal decision was made in careful consideration of the priority of providing excellent care while keeping costs low. This change has allowed nurses at Gwynedd House to focus on care while keeping documentation within limits and not keeping staff at a computer in order to qualify for Medicare funding.

Thus, since Foulkeways at Gwynedd no longer receives funding from Medicare or Medicaid programs the proposed change in documentation required for Pennsylvania licensure is not only onerous but will seriously interfere with the current quality of care provided. This proposed change is particularly problematic as all nursing facilities struggle with staff shortages precipitated by the COVID pandemic.

My husband is living with advanced Parkinson's Disease. Living at Foulkeways makes it possible to keep him independent and maintain his quality of life as an engaged person in an active community. We understand that at some point he will receive care in Gwynedd House and look forward to high quality care continuing there.

As a nurse I am sympathetic to the wish to make documentation work in the interests of patient care. Unfortunately the requirements that this proposed change over to Medicare regulations would have the opposite effect.

For these reasons we request that you not make this change and continue to have Pennsylvania DOH regulations for Nursing Facility Licensure developed and maintained at the state level. The proposed change would hurt Foulkeways patients / residents and provide no benefit.

Thank you for your consideration of this matter,

Julie G. Cox, MSN  
(Rev) C. Richard Cox, MDiv, MA