



From: [Peter Geller](#)
To: [DH, LTCRegs](#)
Cc: mary_knapp@foulkeways.org
Subject: [External] Proposed DOH Pennsylvania Nursing Facility Licensure Regulations to PA Code 201and 211 to Federal Code 42 CFR Part 483
Date: Friday, August 27, 2021 4:01:44 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

As residents of Foulkeways at Gwynedd, my wife and I have had more than one occasion to deal with the medical care provided. Although not residents of Gwynedd House, our monthly maintenance payments contribute to both our own and the care of all the residents of Foulkeways, including the residence of Gwynedd House. One of the major reasons we chose Foulkeways was the superb reputation of the medical staff and level of care on premise. We willingly share the cost of this care for all residents since that is what a unified, caring community does.

We do, however, think that the cost of these changes, especially since Foulkeways voluntarily withdrew from the Medicare program in 2017, is grossly unjustified and unfair because the new expenses will go to the funding of additional bureaucracy and computer support equipment and programs to support an extensive and unnecessary, in the case of Foulkeways, amount of new paperwork and reporting. It appears that not a single penny of this increased cost will actually go to improving the level of our nursing home care.

The much higher than required level of care at Foulkeways is testified to every day by all our residents. Foulkeways has always been ranked as among the very best facilities in the nation, and it has never been cited for any shortcoming or withholding of any medically appropriate care. We are a resident funded facility and cannot afford the level of supervision necessary for the lowest levels of care provided by many unscrupulous nursing home operators. These are the facilities that have to be targeted for additional supervision, not a universal application to all facilities.

Especially in the ongoing Corona Pandemic, we cannot afford to divert funds from patient care. Your nearly doubling of nursing hours per patient recommendation doesn't take into account the very substantial additional staff hours spent by other medical professionals. The medical staff is already overburdened and "burnt out" by the stress of dealing with the huge demand for care. In fact, many of the non-medical functions that you will mandate to the nursing staff can be better performed by other staff professions and individual volunteer help provided by our Foulkeways residents.

We strongly urge the DOH to reject the recommended final regulations. The ultimate consequences of this ill thought out document will be to significantly reduce the level of care we, and many other equally deserving facilities provide. Indeed, it threatens the very financial viability of the entire Gwynedd House facility.

Thank you for your consideration,

Peter and Nancy Geller