



From: [Don Griffin](#)
To: [DH, LTCRegs](#)
Subject: [External] Proposed DOH regulations
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Attachments: [DOH Reg Response.pdf](#)

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Attn: Lori Gutierrez, Deputy Director, Office of Policy

Comments noted here and in the attached document.

Donald Griffin

Proposed DOH regulations that replace 28 PA Code Chapters 201 and 211

Quality Assurance procedures for activities required for licensed adult care facilities, such as medications administered, bed checks, hygiene, include adequate documentation and could easily be a focal point of central authority regulations. There is much in the language of the proposed regulations that might isolate central authority, PA DOH and each County DOH, from accountability for what might happen at a nursing home or adult care facility. The issue is: how many times and in how many ways must a supervised person detail what they have done?

COVID-19 and Infection Control

The Foulkeways staff has done an excellent job protecting residents from COVID-19. We are aware that infected persons who are asymptomatic may not have elevated temperatures but still be shedding infectious virus. Throughout much of the early part of the pandemic speedy and accurate testing was not available. Despite those challenges the rate of infection in Gwynedd House (the nursing home component of Foulkeways at Gwynedd) has maintained relatively low levels of infection. The proposed regulation contains nothing that might safeguard residents from staff or visitors importing infectious agents such as COVID-19 in the future.

Offered in response to request for comments by:

Donald R. Griffin, a resident of Foulkeways, a Life Care Community.

