



1125 Foulkeways
Gwynedd, PA 19436
August 30, 2021

Lori Gutierrez
Deputy Director, Office of Policy
625 Forster Street, Room 814
Health and Welfare Building
Harrisburg, PA 17120

Dear Ms. Gutierrez:

Foulkeways at Gwynedd is a resident funded, Continuing Care Retirement Community (CCRC). Gwynedd House is the skilled nursing facility within Foulkeways. In 2017 the decision was made to withdraw from Medicare for the following reasons:

1. Staff time, which was used to document conformance to the Medicare regulations, would be better used providing direct patient care.
2. The loss of Medicare reimbursement for patient care was not essential to the good function and ongoing financial viability of Foulkeways.

To date Foulkeways has met all Pennsylvania and Montgomery County regulations.

The revisions to the current regulations, which incorporate the requirements of 21 CFR 483, will not impact the excellent care provided at Gwynedd House. There is no reason to expect that the quality of care would be positively impacted by compliance to the proposed regulations. In my view the new regulations, if adopted as written, would constitute an unfunded mandate imposed on the Foulkeways community as a whole. The excellent quality of care at Gwynedd House is assured by policy, procedure and practice. That quality is demonstrated by the low number of COVID-19 positive tests among staff and residents and the low number of infections within the Foulkeways community.

In the Wolf administration press release of July 21, 2021 it states that compliance with CMS regulations, "will make the Department of Health's oversight process more efficient, create consistency and eliminate confusion in the application of the standards." It is not the responsibility of nursing homes to improve the efficiency of DOH. As such the proposed regulation seems to be a remedy for a problem that does not apply to Foulkeways at Gwynedd.

Thank you in advance for your attention to my comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth T. Hornberger". The signature is fluid and cursive.

Elizabeth T. Hornberger, Foulkeways Resident