



From: [Paul Hough](#)
To: [DH, LTCRegs](#)
Cc: [Mary_Knapp@foulkeways.org](#); [Phil_DeBaun@foulkeways.org](#)
Subject: [External] Department of Health Pennsylvania Nursing Facility Licensure Regulations to 28 PA. Code 201 and 211 to Federal Code 42 CFR Part 483
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Attention: Lori Gutierrez, Deputy Director, Office of Policy

Reference is made to the above noted "Subject" on increased regulation, and it's impact to the "Foulkeway's at Gwynedd" institution.

As an interested party, I strongly recommend that the status quo be maintained as it relates to Foulkeways' position within the current regulation. My family has been the beneficiary of many generations of elder care at Foulkeways, and, as the saying goes...if it isn't broken, don't fix it. I realize there is some elegance in having a complete universe of compliance to regulation, but this is a case where the "end does not justify the means."

By now, I'm sure you are aware that:

• Foulkeways at Gwynedd's Nursing Facility withdrew from the Medicare program in 2017 because they wanted to allow the nursing home staff to spend time providing care rather than the burdensome effort to document for Medicare money. From the standpoint of residence and their families, they have been incredibly successful in achieving this higher level of care, [articularly since 2017.

The quality of care in Gwynedd House (Nursing Facility) is strong, and has been for the multiple generations that my family has been residents. They don't need the additional Federal regulations to be imposed on them in order to provide this care, especially when receiving no funds from Medicare or Medicaid. That would be counter-productive, add no value, and be a waste of effort of the staff that would be better spent looking after the residents.

The costs of care will go up for all residents and their families, as the Nursing Facility care is entirely resident/family funded. As a Quaker-based institution, simplicity and community are of paramount importance, and the added financial burden is inconsistent with these testimonies.

The entire world is in the middle of a COVID pandemic, and the elderly are at particular risk. Staff shortages exist, and the imposition of additional government requirements is burdensome, unnecessary, and counter-productive to providing elderly care. In fact, these regulations could create even greater risk to the Foulkeways residents if the cost of the burdensome requirements displaced the ability to provide the existing level of care. This is no time to make things worse by adding additional, unnecessary requirements.

Foulkeways has been a mainstay of my family's elder care for multiple generations. The organization is sound, effective, caring, financially independent, and provides a high quality of care. It would be a shameful if increased regulation, with no funding by the Federal or State government, would put this in jeopardy.

To be clear, I strongly recommend that the status quo be maintained as it relates to Foulkeways' position within the current regulation.

Sincerely,

Paul H. Hough