



Susan Katz  
10 Wick Lane  
Randolph, NJ 07869

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

Dear Deputy Gutierrez,

I am writing regarding the excellent level of care that my Mother, Marion Thompson, receives as a resident at Foulkeways at Gwynedd's Nursing Facility.

This relates to the to the proposed Department of Health (DOH) Pennsylvania Nursing Facility Licensure Regulations to 28 PA. Code 201 and 211 to Federal Code 42 CFR Part 483.

Foulkeways at Gwynedd's Nursing Facility withdrew from the Medicare program in 2017 because they wanted to allow the nursing home staff time to spend their time with providing care rather than sitting at a computer documenting for Medicare money.

The quality of care in Gwynedd House (Nursing Facility) is excellent, and I believe the staff does not need the Federal regulations to be imposed on them while they receive no funds from Medicare or Medicaid.

I believe the proposed Federal regulations will present a burden in terms of (1) extra costs to residents, (2) unnecessary documentation hours the Foulkeways staff will be required to perform, and (3) less staff time available for the families of residents who are accustomed to receiving updates about their loved ones who reside at Foulkeways. As a daughter of a Foulkeways resident, this last point particularly concerns me. Allow me to provide 3 examples of how the Foulkeways staff has partnered with me to improve my Mother's quality of life over the past couple of years. Note that most of this was accomplished in the middle of the COVID pandemic, when an imposition of additional government requirements would be especially burdensome and unnecessary.

Three examples of my Mother's excellent care are described below:

When Mom had a viral infection in the spring of 2020, I was able to have detailed conversations with the nurses regarding Mom's symptoms, diet, and the Covid test procedure and test results. Of course, I felt very reassured and relieved that Mom did not have a Covid infection. This situation helped alert me to how serious the pandemic was, and motivated me find alternative ways of connecting with Mom: I was able to establish a new routine of telephoning Mom on a daily basis that gave Mom and I a better quality of life throughout the pandemic, especially during the time I was not allowed to make in-person visits. I still make at least 4 telephone calls

each week with Mom. The Foulkeways staff has helped facilitate these phone conversations by assisting Mom with the phone when she needs it, letting me know when Mom was not available but when she could be reached later by phone, helping me understand her variable state of mind and energy level that affect her communication with me, et cetera.

When Mom was feeling body stiffness in the winter of 2020, but was unable to sustain a physical fitness program, the nurses and occupational therapist partnered with me to create a special program with an outside massage therapist so Mom could safely and comfortably receive regular massages and gentle stretch exercises. I believe this greatly helped improve Mom's physical and mental health, and she is now able to participate in more of the scheduled activity programs offered each week at Foulkeways – a completely unexpected benefit. I am delighted! We were able to do this because of the partnership between me, the Foulkeways staff, and the outside massage therapist. This required a full understanding of my Mother, relying on the training, competency and tenure of the staff, and their ability to communicate information about Mom to me and to the massage therapist.

Mom has a chronic eye condition, and the nurses have spent much time and effort to keep her eyes healthy. Just before the pandemic, I met with Mom's nurse practitioner regarding treatment options for the eye condition. I suggested one procedure and said I would help with non-professional logistics to support the procedure, during my weekly in-person visits. Imagine my surprise when, many months later, when I was able to resume my in-person visits, that the full procedure and logistical support had been put in place without my assistance. This demonstrates yet again how the staff provide excellent care. Mom's eyes are in great shape. During my in-person visits to Mom her over the past few months, I am finally getting to spend time with her again, and I have been so pleased to see how healthy and happy she looks. It is remarkable to me, and I tell my family regularly about it!

I believe that these 3 examples illustrate the excellent care that Foulkeways staff provides to Mom, and how well this staff is able to partner with me. I hope you can appreciate that these 3 examples also reflect the time—intensive, personal initiative that the staff is currently able to make, and that if the staff had to spend time complying with additional Federal regulations, this could result in their being unable to continue these activities, or unable to do so with the degree of effort that results in such excellent care for Mom, a benefit that Mom and I highly value.

Please do not hesitate to contact me if you would like to discuss any of this information in more detail.

Sincerely,

Susan E. Katz