



From: [Alfred Kuffler](#)
To: [DH, LTCRegs](#)
Subject: [External] Proposed DOH Pa. Nursing Facility Licensure Regulations - 28 Pa. Code 201,211 relating to 42 CFR Part 483
Date: Friday, August 27, 2021 12:27:54 PM

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Att: Lori Gutierrez, Deputy Director, Office of Policy

Dear Sirs:

We write as concerned residents of Foulkeways at Gwynedd, a CCRC located in Gwynedd Pa. WE are a community of something around 425 residents, of which about 325 reside in the facility's independent living section with the balance in assisted living and the skilled nursing areas. At the moment we are part of the independent living community, but came to Foulkeways in considerable part because of its reputation for high quality of and caring attention given residents in the assisted living and nursing facilities.

We wish to register our view that engrafting federal Medicare regulations on to the Commonwealth's existing requirements serves no useful purpose for this community.

In support of our position we would ask you to consider the following:

- (1) In 2017 after very careful consideration Foulkeways withdrew its nursing facility from the Medicare program because in our particular circumstances, the burdens of meeting Medicare's requirements well exceeded the benefits being derived. This dynamic remains operative and if the Commonwealth imposes on us the substantial additional cost and effort the Medicare regulations require, no real additional benefit will accrue to this institution.
- (2) We are advised that Foulkeways receives no funds from Medicare or Medicaid and it is expected that Foulkeways will continue to obtain no federal funding from these sources. In these circumstances, being subjected to Medicare requirements really produces no benefits, especially when the institution is in compliance with all applicable federal and state requirements and is delivering high quality care, as your own records surely confirm.
- (3) Foulkeways" residents fund operations and so the increased administrative burden that the Commonwealth's imposition of federal requirements will impose will in all probability require the institution to take on additional staff with the concomitant increase in costs to the residents. Increased costs of any kind, and especially those with no perceived benefit are of particular concern, especially to those here who are on fixed incomes.

We thank you for your attention to this matter.

Sincerely,

Linda and Alfred J. Kuffler

06 Foulkeways
Gwynedd, Pa. 19436

