



From: [Cynthia Levy](#)
To: [DH_LTCRegs](#)
Subject: [External] Comments on Proposed DOH Changes to PA Nursing Facility Licensure Regulations
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To the attention of: Lori Gutierrez, Deputy Director, Office of Policy

Comments on proposed Department of Health changes to Pennsylvania Nursing Facility Licensure Regulations (28 PA Code 201 and 211 to Federal Code 42 CFR Part 483)

My husband and I made the decision to move to Foulkeways, a life care community in Gwynedd, Pennsylvania, in 2016 in part because of the quality of health care services offered to residents, especially in Gwynedd House, the skilled nursing facility on campus. Before we made the decision to move here ourselves, I had been a longtime Quaker and a member of Gwynedd Friends Meeting, which founded Foulkeways over fifty years ago, and had seen the wonderful nursing care so many of my friends had received here over the years.

Foulkeways Nursing Facility made the decision to withdraw from the Medicare program in 2017 because the administration had determined that doing so would decrease the amount of time needed to manage the paperwork and allow nursing staff to spend more time caring for patients. I supported the decision and the rationale behind it and hoped that both staff and residents would benefit. Over the past four years, the high quality of care residents receive in Gwynedd House has continued unabated, even given the enormous challenges and strains of the Covid pandemic on all of us, residents and staff alike.

I am truly alarmed with the proposed changes to regulations by the Department of Health. Adoption of these changes would mean that we must now comply with additional government requirements *even though we do not get any Medicare or Medicaid funds in return*. That will, I believe, exacerbate staff shortages and other current pandemic-related challenges, increase costs, and undermine the ability of staff to provide the quality care they have been and continue to be committed to.

We, the residents at Foulkeways, are the ones who will ultimately bear this burden. Residents at Foulkeways fund the Nursing Facility. As costs of care go up with the proposed regulations, our annual fees will increase incrementally, creating a very real financial burden on many residents who have fixed incomes.

I am very afraid that should the proposed changes go through, those of us who live at Foulkeways are likely to face the very real prospect of unacceptably diminished care at unsustainably higher costs in the future.

Respectfully submitted,
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