



Lori Gutierrez  
Deputy Director  
Office of Policy  
August 29, 2021

Dear Lori Gutierrez,

I am writing to offer my comments to the proposed changes to DOH Pennsylvania Nursing Facility Licensure Regulations 28 PA Code 201 and 211 to Federal Code 42 CFR Part 483.

For the past 13.5 years, my wife and I have lived at the Foulkeways Life Care facility in Gwynedd, PA. For 9 of those years, I was able to volunteer in a number of ways to contribute to the community of Foulkeways. Over the last four years I have been fighting against the effects of two craniotomies (openings of my skull) to remove a malignant neoplasm (meningioma).

The upgrading of care from independent living to skilled nursing in Gwynedd House is part of the contract between Foulkeways and us: the volunteer work is part of the unwritten contract between residents and administration for a non-profit organization - we residents fund the increased costs of skilled nursing through maintenance fees and contributions. All residents have input to the setting of fees by the administration. Consequently, our nursing facility provides high quality care without the burden of overhead costs of administrators monitoring compliance with a multitude of superfluous regulations. Even worse our nursing staff may have to take their time away from patient care to fill out justifications for treatment.

On a note of personal experience, my wife was in a 3 person psychologist practice in Tennessee when the rules changed. The net result was the necessity to hire an office manager to deal with the extra paperwork and compliance documents. This extra expense was an unnecessary burden on the three psychologists and was a diversion from treating their patients.

We residents certainly don't want that to happen here at Gwynedd House!

Please do not include facilities like our skilled nursing facility (Gwynedd House) in the proposed changes to PA DOH Nursing Facility Licensure Regulations 28 PA Code 201 and 211 to Federal Code 42 CFR Part 483.

Thank you.

Victor C. Vaughen PhD, P. E.  
Resident of Gwynedd House at  
Foulkeways, Gwynedd PA 19436