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Cc: mary_knapp@foulkeways.org; phil_debaun@foulkeways.org
Subject: [External] Proposed Changes to PA Nursing Facility Licensing Regulations
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Lori Gutierrez
Deputy Director, Office of Policy, PA Department of Health

Dear Ms Gutierrez,

I am writing to express my concerns regarding the proposed changes to PA Nursing Facility Licensing Regulations, 28 PA Code 201 and 211 and Federal Code 42 CFR Part 483.

As a long time resident of Foulkeways at Gwynedd, I am aware that our Skilled Nursing Facility withdrew from the Medicare program in 2017, because Foulkeways believed the Gwynedd House nursing staff could provide better patient care if they could spend less time at the computer documenting their time in order to receive Medicare funds.

As a result of that change, the quality of nursing care at Gwynedd House, our Skilled Nursing Facility, has been consistently excellent without the burden of Federal regulations and without receiving any funding from Medicare or Medicaid. This has been true even through the past year of dealing with Covid-19 and following the CDC, state and local regulations that have been keeping our residents safe from exposure to the virus. I can personally attest to the excellent care my husband received at Gwynedd House as he recovered from a craniotomy during the months when Gwynedd House was in lockdown and continuing to the present time. I believe that adding additional governmental requirements will add an unnecessary burden to the staff's continuing efforts to provide the best care possible in our present healthcare environment.

I would also like to point out that Foulkeways at Gwynedd is a non-profit Life Care Community and that funds for our Skilled Nursing Facility are provided by our residents. Resident costs will most certainly go up if the proposed changes are put into effect, creating a financial burden at a time when many residents are already finding it difficult to make ends meet.

I strongly oppose these proposed changes to state regulations and hope the Skilled Nursing Facility staff will be able to continue serving our residents under the current arrangements.

Thank you for taking my views into consideration.

Yours truly,

Janet G. Wallace
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