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To: [DH, LTCRegs](#)
Cc: Mary_Knapp@Foulkeways.org; Phil_DeBaun@Foulkeways.org; "Mom "
Subject: [External] Comments to proposed Department of Health (DOH) Pennsylvania Nursing Facility Licensure Regulations to 28 PA. Code 201 and 211 to Federal Code 42 CFR Part 483
Date: Friday, August 27, 2021 12:06:09 PM

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Lori Gutierrez, Deputy Director, Office of Policy

Dear MS, Gutierrez,

I am writing to you on behalf of Foulkeways, one of the few CCRC's that elects not to take Medicare funds for Gwynedd House Nursing Facility but maintains a very high quality of care, exceeding the Medicare minimum standards. My family (great grandmother, grandparents, mother, aunt and uncle) have all been residents at Foulkeways. My great grandmother and grandparents have all received excellent care at Gwynedd House and I expect that the others will receive the same level of care eventually as needed. My great grandmother who lived to 109 and my grandparents were well cared for into their 90s. I have been privileged to meet some of the staff who cared for them and still work at Foulkeways now. Over the many years I have had family here, I have never had to be concerned that they weren't getting the best and very personal care. And I speak with experience of the healthcare system, having a degree in pharmacy and majoring in healthcare while getting my business degree. I am a critical customer of the healthcare system.

The actions Foulkeways has taken are responsible medically, compassionately and fiscally while exceeding the Medicare standards. Forcing compliance and documentation for a program that is not in use imposes an excessive, expensive and frankly, unfair penalty that will take resources away from the care of residents and my family.

- 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 with providing care rather than sitting at a computer documenting for Medicare money
- The quality of care in Gwynedd House (Nursing Facility) is very good/excellent, Federal regulations don't need to be imposed on the staff while no funds from Medicare or Medicaid are received
- The costs of care will go up as the Nursing Facility care is Resident funded
- We are in the middle of a COVID pandemic, there are staff shortages, the imposition of additional government requirements is burdensome and unnecessary

Thank you for taking my comments into consideration.

Respectfully,

Christina Willis Cramton