



**From:** [Betsy Hornberger](#)  
**To:** [DH.LTCRegs](#)  
**Subject:** [External] Department of Health (DOH) Pennsylvania Nursing Facility Licensure Regulations  
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Lori Gutierrez  
Deputy Director, Office of Policy  
Re: Department of Health (DOH) Pennsylvania Nursing Facility Licensure Regulations

Dear Ms. Gutierrez:

Currently under consideration are revisions to Department of Health (DOH) Pennsylvania Nursing Facility Licensure Regulations. These revisions among other changes would require compliance with Federal Code 42 CFR Part 483.

Foulkeways at Gwynedd is a resident funded, Continuing Care Retirement Community (CCRC). Gwynedd House is the skilled nursing facility within Foulkeways. In 2017 the decision was made to withdraw from Medicare for the following reasons:

1. Staff time, which was used to document conformance to the Medicare regulations, would be better used providing direct patient care.
2. The loss of Medicare reimbursement for patient care was not essential to the good function and ongoing financial viability of Foulkeways.

As of 2022 Foulkeways continues to meet all Pennsylvania and Montgomery County regulations. The revisions to the current Pennsylvania DOH regulations will not improve the already excellent care provided at Gwynedd House.

Earlier this year I had a hip surgery and spent the first three weeks of my postop recovery at Gwynedd House. I cannot say enough about superb quality of my care. It was in a word "excellent." In my view the new regulations, if adopted as written:

1. Would not improve the quality of care at Gwynedd House
2. Would constitute an unfunded mandate imposed on the Foulkeways community.

Thank you in advance for your attention to my comments.

Elizabeth T. Hornberger  
1125 Foulkeways  
Gwynedd, PA 19436  
October 24, 2022