



From: [pat.morris](#)
To: [DH.LTCRegs](#)
Subject: [External] Comments to Proposed Department of Health, Pennsylvania Nursing Facility Licensure to 28PA Code 201 and 211 to Federal Code 42 CFR Part 483
Date: Monday, October 24, 2022 10:58:17 AM

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To: Lori Gutierrez, Deputy Director, Office of Policy

Dear Ms. Gutierrez,

I urge you to exempt adopting the unreasonable Medicare requirements for Foulkeways's skilled-care facility for the following reasons:

1. Foulkeways at Gwynedd's Nursing Facility withdrew from the Medicare program in 2017 to allow the nursing staff to provide care to the patients rather than sitting at a computer documenting for Medicare money.
2. Foulkeways is a small, self-funded community with a 52-bed nursing home. Imposing massive Federal regulations on us would be onerous.
3. Our quality of care in the Nursing Facility (Gwynedd House) is very good/excellent, as our 2022 DOH survey was deficiency free.
4. Our Nursing Care facility is resident-funded. Under the proposed regulations, we would be required to add a Registered Nurse to do Medicare paperwork. The average cost to hire an RN is \$125,000. The \$125,000 hiring cost for an RN would be passed along to the residents. I am one of those residents to whom that cost would be passed along.
5. Foulkeways should be exempt from Federal Medicare regulations imposed on us by the State.

Thank you for your time and consideration to exempt Foulkeways from the above referenced Medicare requirements.

Sincerely,
Patricia Morris
Foulkeways at Gwynedd
1002 Foulkeways, Apt. K2
Gwynedd, PA 19436