



From: [Rita Porreca](#)
To: [DH, LTCRegs](#)
Cc: [Mary Knapp](#)
Subject: [External] Comments on Proposed Department of Health (DOH) Pennsylvania Nursing Facility Licensure Regulations to 28 PA Code 201 and 211 to Federal Code 42. CFR Part 483
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Lori Gutierrez
Deputy Director
Office of Policy

Dear Ms. Gutierrez,

The following are comments on the proposed Department of Health Pennsylvania Nursing Facility Regulations that replace 28 PA. Code Chapters 201 and 211 to Federal Code 42 CFR Part 483.

As current independent resident of Foulkeways, a continuing care community in Gwynedd, PA, who self funds our skilled nursing facility the proposed regulation would put undue burden and expense on our facility which receives no financial reimbursement from Medicare or Medicare. Our nursing home facility in our 2022 DOH survey was deficiency free which shows that we have an excellent facility and very high standard of care for our resident patients without the added burden of the Medicare paperwork. To impose the Medicare paperwork workload on our facility who chose to withdraw from the Medicare program in 2017 and receives no funding from Medicare would be unreasonable. That was the specific reason Foulkeways chose to withdraw. There is absolutely no payback for Foulkeways to go through the added expense and burden of the Medicare paperwork requirements.

I specifically chose to retire to FoulkeWays in 2015 because of the excellent skilled nursing facility. My mother was a resident of the skilled nursing facility for three years prior to her death in 2012 and I saw the excellent care and concern she received. She was made to feel that this was her home and they created an environment as normal as possible while giving all the medical attention and treatments necessary.

In 2018 I had surgery and spent three days post-hospitalization as an inpatient in the FoulkeWays skilled nursing facility. All my needs were met from the moment I arrived. The equipment that I needed to make my stay as safe and comfortable as possible was provided. Many of the nursing staff I already knew from the time my mother was there. I had ancillary services, such as PT and OT came directly to me and my peace of mind and felt security aided my recovery.

In 2019 my husband spent six weeks in Foulkeways skilled nursing facility after thyroid cancer surgery with a tracheotomy and nasal feeding tube. I cannot fully express the wonderful treatment care he received. He was placed in a room immediately next to the nursing station so that he was close to the nursing staff in an emergency. In the middle of the

night I was called because the night nurse suspected an infection developing and immediate action was taken. He spent another week back at Fox Chase Cancer Center dealing with that.

His weaning from the tracheotomy and feeding tube were dealt with all in an atmosphere that was highly skilled medically but as “normal” home environment as well. Nurses do not push around computer carts. There nursing station is a lovely desk with a computer on it like you would have in a home with the actually nursing station charts, meds and supplies in a separate room behind it. All this is done to give the patients a feeling of home and not a hospital.

Imposing additional regulations to be Medicare compliant would take away from the excellent patient care and “normal” living environment that Foulkeways’s skilled nursing facility has worked so hard to achieve. I choose Foulkeways because it was different and stood out as excellent from all the other skilled nursing facility.

Please continue to exempt Pennsylvania nursing facilities who do not take Medicare or Medicaid reimbursement such as Foulkeways to be exempt from this regulation. Thank you for your consideration.

Respectfully submitted,

Rita Porreca

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...because relationships matter