



**From:** [jonathan.rhoads2095@gmail.com](mailto:jonathan.rhoads2095@gmail.com)  
**To:** [DH, LTCRegs](#)  
**Subject:** [External] DOH PA 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, IRRC

Dear Ms. Gutierrez,

I believe the proposed regulations are unfair to skilled nursing facilities that do not accept Medicare funding.

Among other requirements, these proposed regulations call for a Registered Nurse to enter voluminous data into a computer to certify the accuracy of MDS for Medicare funding; very time consuming. In the current era such individuals are hard to find, command a handsome salary (and benefits) and their time is much better spent taking care of patients. If an institution does not receive Medicare funding, this is a waste of a valuable health care resource, and drives up costs without benefiting the patients in the facility.

I believe there should be an exception from these onerous regulations for skilled nursing facilities that do not participate in Medicare.

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