



From: [Joel Sartorius](#)
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: Sunday, October 23, 2022 2:29:03 PM
Attachments: [PA Medicare Requirements 20221023.docx](#)

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Please read the letter attached. Thank you.

Ira-Joel Sartorius

Ira-Joël Sartorius
905 Foulkeways
Gwynedd PA 19436

October 23, 2022

Lori Gutierrez, Deputy Director
Office of Policy
Department of Health
State of Pennsylvania
Harrisburg PA 17120

Re: Comments to Proposed Department of Health, Pennsylvania Nursing Facility Licensure to 28PA Code 201 and 211 to Federal Code 42 CFR Part 483

Dear Ms. Gutierrez:

If Pennsylvania adopts the above-referenced law, our Nursing Facility will be required to hire an additional nurse to attend solely to Medicare paperwork. Hiring this RN would be difficult, not to mention the additional salary of \$125,000 annual salary and benefits.

Foulkeways's skilled-nursing residence is part of a not-for-profit facility. Since 2017 we have not participated in Medicare. Rather than losing a nurse to perform the necessary Medicare paperwork, we preferred to have this professional devoted to maintaining the excellent care our skilled-care facility is known for (reference our 2022 DOH survey which shows our facility is deficiency free).

I urge you to reconsider adopting the unreasonable Medicare requirements for Foulkeways's skilled-care facility.

Thank you.

Sincerely,