

10/1/2021

Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, D.C. 20201
CMS-10765

RE: Patient Access to Inpatient Rehabilitation Hospitals

Dear Administrator Brooks-LaSure:

My name is Dr. Keith Burchil, a Physical Medicine and Rehabilitation physician serving patients in San Antonio, TX, and I am writing you to ask that you terminate Centers for Medicare and Medicaid Services (CMS) review choice demonstration for inpatient rehabilitation facilities (IRF RCD). It is my understanding that the proposed demonstration will require IRFs to submit to a review process for all traditional Medicare claims submitted for payment.

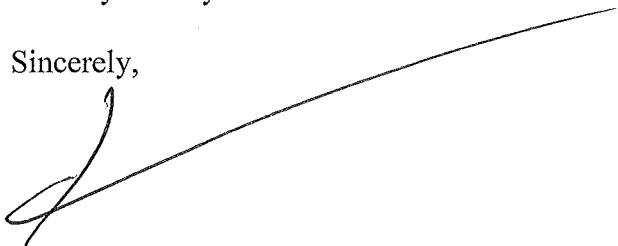
The demonstration proposal has been released during a time when health care providers are already stretched thin because of the emotional, physical, and financial toll of a global pandemic. If this demonstration takes place, this will simply become another burden for clinicians and non-clinical staff. IRFs provide critical services that leave a lasting effect on patients' lives. The care provided by IRFs positively impacts the overall health and quality of life of the communities the facility is a part of.

The current design of this demonstration has the potential to limit access to care for patients and permanently change the types of patients who receive IRF services. IRFs could be forced to turn patients away with critical diagnosis such as stroke, amputation, brain injuries, traumas and cardiac conditions who need their services. Research has proven definitively that inpatient rehabilitation is the gold standard for getting these patients back to productive and satisfying lives.

I urge CMS to halt this demonstration and engage with providers and stakeholders to develop a shared understanding of Medicare standards for IRF services. As healthcare providers continue to battle on the front lines of the pandemic we should be doing all we can to support them as they help their communities recover from their most difficult health battles and regain their lives.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to be "Keith Burchil", written over a long, thin horizontal line that extends across the page.