

October 4, 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

Administrator Brooks-LaSure:

My name is Shelby Brown and I am a community advocate for stroke patients in Texarkana, Texas as well as our entire service area. As a state of Texas designated, level II Primary Stroke Center, Wadley Regional Medical Center works closely with our post-acute inpatient rehabilitation providers to ensure all stroke survivors are afforded the best opportunity to achieve the fullest recovery possible. I am writing to raise concerns about the Centers for Medicare and Medicaid Services' (CMS) Review Choice Demonstration (RCD) for Inpatient Rehabilitation Facilities.

Inpatient rehabilitation hospitals are an integral part of the care transition and play an instrumental role in the recovery process for patients suffering from a stroke, as well as other debilitating, complex conditions. The therapy and around-the-clock care provided in these hospitals are key to patients returning home with optimum outcomes. We have sent patients to a rehabilitation hospital unable to walk, and with intensive therapy, they are able to leave on their own two feet, which is a miraculous sight for their caregivers and family and most importantly to these patients.

We are concerned the RCD will make this needed level of care, the intensive rehab therapy provided at rehabilitation hospitals, less accessible for many patients. The AHA/ASA guidelines call for a thorough examination upon discharge from acute care by the care team and many stroke patients need the intense therapy provided in rehabilitation hospitals to achieve their full potential. Questioning the judgment of their physicians on the level of care their patients need through this new requirement would be detrimental to patient access and patient outcomes. If they are forced to seek care in other settings because of the RCD, these patients may experience inferior outcomes. These patients, many of whom are Medicare beneficiaries, go through an extensive certification process to enter rehabilitation hospitals. Patients eligible and certified as needing rehabilitation hospital care are entitled to receive such care under their Medicare benefit.

In conclusion, as a patient advocate and a Designated Primary Stroke Center in Texarkana, Texas, I hope CMS reconsiders and does not move forward with a Review Choice Demonstration in rehabilitation hospitals.

Thank you,

*Shelby Brown*

Shelby Brown  
Marketing & Planning/Governmental Relations  
Wadley Regional Medical Center