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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

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RE: Patient Access to Inpatient Rehabilitation Hospitals

My name is Vincent Ohaju and I am a Trauma medical Director and the Chief of Surgery at St. Joseph Health in Bryan, Texas. I have been made aware that the 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.

During a pandemic, when the hospital systems have limited resources, this is not the time to begin such an arduous process. We have had extensive delays for our patients who have managed Medicare and private insurance plans as approvals take several days. This causes a dam to the flow of moving patients out of the acute hospital where beds are in short supply. We do not need further delays by excessive reviews.

When I identify a patient that is in need of rehabilitative services at an IRF level of care I understand that they require frequent physician visits, 24-hr nursing, and intensive rehabilitation with at least two disciplines of physical therapy, occupational therapy, and speech therapy. This describes a significant portion of patients on my trauma services. These patients are identified and recommended by myself, our acute therapists, and our case management team. Patients then go through further formal review from the IRF to ensure they are meeting Medicare criteria. We are the best medical professionals to determine appropriateness as we are seeing these patients in person and providing hands on care.

Patients that qualify do exceptionally well at IRF. I have seen the results by patients making it safely home in a few short weeks. Patients on our service deserve to get the patient care and the intensive therapy provided to them through an IRF.

Please take this into deep consideration,

A handwritten signature in blue ink, appearing to read "Vincent Ohaju", is written over a light blue horizontal line.

Vincent Ohaju, DO, FACOS, FACS

Trauma Medical Director/Chief of Surgery