

From: [REDACTED]
To: MN_Health_PIR@state.mn.us
Subject: Public comment on NOBIS rehab hospital
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To Whom It May Concern,

My name is Dr. Anne Tita and I currently work as a PM&R Staff Physician at Allina Health Abbott Northwestern Hospital. I have been in this role for over 5 years. I am writing today to share my thoughts on the bed moratorium exception proposal from Nobis Rehabilitation Partners.

When considering whether a project is in the public interest, it is important to consider three factors:

1. Who will have access to these services?
2. What will this provider's long-term roots be in the community?
3. How will they integrate across the continuum?

As a healthcare provider, when I consider Nobis's proposal under those three key factors, it gives me great concern. We must ensure that beds added through a moratorium exception are accessible to all, reliable, and beneficial to our state's continuum of care.

I am opposed to the project because Nobis intends only to serve our community for their inpatient rehab needs. They do not intend to provide the less profitable services in the continuum such as acute hospital therapy and consults, outpatient hospital follow ups and other rehab outpatient care, community services and recreation, vocational rehab, and research. Courage Kenny Rehab Institute and other rehab organizations in Minnesota are committed to providing the continuum of services to all patients, not just the profitable parts. Additionally, I am concerned that Nobis will be inclined to choose the most profitable patients, leaving the uninsured and underinsured patients to the other inpatient rehab facilities. Courage Kenny Rehab Institute, Allina, and other health systems in the Twin Cities are committed to research and education. I see no intention by Nobis to contribute to research or education. If our current Twin Cities community of rehab providers loses inpatient rehab business to Nobis, the other rehab organizations in the Twin Cities will lose money and be far less able to provide all the other essential rehab services they currently manage.

Thank you for the ability to submit comments.

Sincerely,

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