



Via Electronic Submission

January 2, 2024

Ms. Alisha Simon
Health Economics Program
PO Box 64882
St. Paul, MN 55164-0882

RE: Request for public comment on the proposed inpatient rehabilitation hospital

Dear Ms. Simon,

Hennepin Healthcare System (HHS) appreciates the opportunity to comment on the Nobis Rehabilitation Partners proposal to open a 60-bed inpatient rehabilitation facility in Roseville.

Hennepin Healthcare has provided rehabilitation services in Minneapolis through the Knapp Rehabilitation Center for 54 years. Recently, Hennepin Healthcare entered into a partnership agreement with Shirley Ryan AbilityLab, a top-ranked provider of rehabilitation services to bring the services and expertise of the nation's premier rehabilitation hospital to patients of our health system. Our inpatient specialty program serves adolescent and adult patients who have been traumatically injured or disabled in the Greater Minneapolis community. Our team specializes in serving conditions ranging from brain injuries to strokes, neurological conditions, connective tissue disorders and more.

We respectfully submit the following comments related to the proposed inpatient rehabilitation hospital for your consideration:

- We firmly believe all inpatient rehabilitation providers in this market must take Medicaid and complex care needs patients. We therefore request any new inpatient rehabilitation hospital collect and report the percentage of indigent care and the numbers of those they serve on public programs and commit to serving the community for a minimum of five years. Medicaid accounts for about 35% of Hennepin Healthcare's inpatient rehabilitation population and our Knapp Center not only serves a significantly younger age of patients than other markets, with an average age of 53, we also treat more complex patient cases that present discharge planning challenges and in turn impact our ability to serve other patients who need our level of care.
- Hennepin Healthcare, like all health systems, is experiencing staffing challenges especially in subspecialized areas of nursing. Competing with other providers who have a greater commercial insurance source on the salaries they are able to pay their workforce is a significant challenge for our safety-net system. We ask that the state takes this imbalance



into consideration and helps to ensure our safety-net system is able to staff to an adequate level to maintain the inpatient services that the state relies on to care for Medicaid patients.

- The State of Minnesota should also invest in existing providers that offer high-quality cost-effective care. Our partnership with Shirley Ryan has yielded positive metric results and improvements that we are eager to maximize. The focus of our challenges is less about the number of inpatient rehabilitation beds and more about staff capacity to take care of the patients in those beds. Nonetheless, further investments are needed to support the workforce capacity needed to provide a higher level of care, 24/7 care coverage, and an evidence-based approach to care.

Thank you for your ongoing work on behalf of the Minnesotans we serve. We remain steadfastly committed to improving the health of all Minnesotans through accessible health care that enhances the quality of our vibrant communities.

Sincerely,

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