

January 19, 2024

Stefan Gildemeister
Director, Health Economics Program
Minnesota Department of Health

Submitted electronically

Dear Mr. Gildemeister

Thank you for the opportunity to provide comments as part of the public interest review process of the Nobis Rehabilitation Partners (“Nobis”) proposal for an exception to the state’s bed moratorium law to build a sixty-bed inpatient rehabilitation hospital.

Allina Health remains supportive of the public interest review process to provide additional perspectives on the Nobis project and consider the proposal’s merit through the lens of current and future community needs. While we understand that this process can be resource intensive for all parties involved, it creates an important dialogue among stakeholders and policy makers about the impacts of adding certain resources into the health care system.

Allina Health, an integrated health system, is dedicated to the prevention and treatment of illness and enhancing the greater health of individuals, families, and communities throughout Minnesota and western Wisconsin. We serve our communities by providing exceptional care as we prevent illness, restore health, and provide comfort to all who entrust us with their care. As a not-for-profit health care system founded and headquartered in Minnesota, with 28,000 employees, Allina Health has long history of caring for patients from beginning to end-of-life through our 90+ clinics, 12 hospital campuses, 15 retail pharmacies, specialty care centers and specialty medical services providing home care, senior transitions, hospice care and emergency medical transportation services.

Through our Courage Kenny Rehabilitation Institute (CKRI), Allina Health is one of the largest providers of the full continuum of rehabilitation services in the state, spanning post-acute inpatient rehabilitation, outpatient services, as well as wrap around community-based services for those we serve. Between Courage Kenny Rehabilitation Institute at both United Hospital and Abbott Northwestern Hospital, Allina Health currently operates 55 of the 151 in-patient rehabilitation beds in the Twin Cities region. Patients in our facilities receive care from a team of rehabilitation experts, including doctors, nurses, therapists, psychologists, behavioral therapists, and social workers. Our teams have spent decades working with patients across Minnesota and the country, delivering excellent, life-changing care that has proven we are a trusted, reliable provider of in-patient rehabilitation services. Allina Health has a long history of understanding and responding to the needs of our diverse and unique Minnesota communities. The need for a robust post-acute continuum of services is vital not only for the health of the individuals served, but also a critical step-down resource that allows for the continued medically necessary care for a stable patient while also opening access to valuable acute hospital beds for patients who require inpatient admission.

Based on our experience and expertise, when considering Nobis's bed moratorium exception proposal we recommend the state consider three key issues. First is ensuring the services will be accessible for all Minnesotans. As the state's proportion of patients covered under government-sponsored insurance programs grows, it's imperative that these patients have the same access to care that patients with private insurance coverage enjoy. We note that the Nobis proposal does not address how uninsured and government sponsored insured patients will be treated, and how they will care for the most financially vulnerable patients in the state.

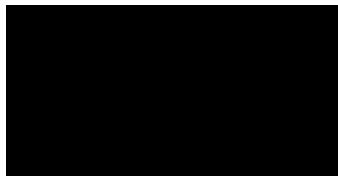
Second, it's important to consider the long-term stability of the proposed beds. While Minnesota has an overall need for inpatient rehabilitation beds, having an abundance of new beds operated by an organization with no existing ties to Minnesota or history of serving the community, increases the risk the organization could reduce, relocate or close altogether in favor of more profitable ventures elsewhere.

Finally, we believe it is of the utmost importance to consider how the proposed addition will integrate into the state's existing continuum of care. By introducing an out-of-state, for-profit provider to the state's market, the state could potentially see disruptions throughout the rehabilitative care continuum. The Nobis proposal only addresses one small piece of post-acute care which happens to be more profitable than the other components of post-acute rehabilitative care. While the goal of adding more inpatient rehab beds is a positive, if the beds are not accessible to all, reliable, and easily integrated into and supportive of the existing continuum, it could result in worse outcomes for patients across Minnesota.

In summary, the proposal from Nobis raises significant questions about the potential impact for Minnesota's health care continuum. Until those questions are adequately addressed, Allina Health urges the state to recommend pausing Nobis's request for a bed moratorium exception so that the true impact of their proposal is understood.

Thank you for the opportunity to comment.

Sincerely,



Brian LeLoup
Vice President
Courage Kenny Rehabilitation Institute, part of Allina Health