From:
To: MN Health PIR@state.mn.us

Subject: Nobis Health proposal: Written comments

Date: Tuesday, December 12, 2023 5:13:48 PM

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To Whom It May Concern,

My name is Liz Friederich and I currently work as the Manager of Care Management for Courage Kenny Rehabilitation Institute. I have been in Care Management with CKRI for over 20 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. Nobis' interest in the long-term rehabilitation of patients is not at the center of their proposal, but rather, they have requested to enter only the IPRU market, thus fragmenting a patients' care between health systems. Working in Care Management, this fragmented care is incredibly detrimental to the patient's long term rehab, as rehab often spans the lifetime following an injury. Furthermore, as a for-profit entity, Nobis prioritizes generating profits for shareholders/owners instead of patient care. In addition, for-profit health care hinders access of services for people who lack the means to pay. Once again, my experience in healthcare, and as a clinical social worker, argues that healthcare should be accessible to all payer sources, rather than allowing the for-profit systems to limit access to those payers with lower reimbursement.

We must ensure that beds added through a moratorium exception are accessible to all, reliable, and beneficial to our state's continuum of care.

Thank you for the ability to submit comments.

Sincerely,

Liz Friederich, LICSW, CBIS

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