#### DEPARTMENT OF HEALTH

#### COMMENT ON PROPOSED HOSPITALS

#### Name:

Kristine Spiewak

### Do you represent an organization? If yes, please specify:

No

# Proposed hospital(s) that you would like to share comments. Please select all that apply:

Nobis Rehabilitation

## Whether the proposed new hospitals are needed to provide timely access to care:

With the growing older population, we will have a greater need for post-acute care rehabilitation options, including but not exclusive to inpatient rehab beds. Providing more inpatient rehab beds without addressing other needs in the rehab continuum will not solve the problem (see email comments).

# The financial impact of the new hospitals on existing hospitals that have emergency departments:

I expect the new Nobis Rehabilitation Hospital to have a negative financial impact on current hospitals in the Twin Cities and Minnesota with inpatient rehab units. (University of MN, Regions, HCMC, United, Abbott Northwestern, North Memorial). Inpatient rehab is only one slice of services provided in the rehab continuum, but it is one of the more profitable ones. Nobis will be essentially skimming off the top, leaving hospitals which provide a full spectrum of rehab services more financially challenged (see email comments).

## How new hospitals would affect the ability of existing hospitals to maintain staff:

There are currently staffing shortages in nursing, therapies, and physicians in the rehab departments of all Twin Cities hospitals. This new hospital will further strain the supply of available staff.

## The extent to which the new hospitals would provide services to nonpaying or low-income patients.:

The Nobis proposal did not indicate a specific plan or quota of patients they will accept with no insurance or low income. Additionally, patients with challenging social situations and complex medical and cognitive needs are more costly to rehab hospitals. Nobis did not provide a plan or assurance they will accept these patients. Without an affiliation to any health system in Minnesota, and with a for-profit status, I am not confident Nobis will provide a significant amount of rehabilitation to these types of patients.

# Please share other thoughts on the proposals including, but not limited to, views on new models of for-profit care in Minnesota:

Nobis is not proposing a new or innovative model of rehabilitation. Stand-alone rehab hospitals exist nationally and there are benefits and disadvantages. The Nobis for-profit model is a step backwards, with no intention to invest in the full continuum of rehab and no intention to invest in education or research. Inpatient rehab is one of the more profitable aspects of all the rehabilitative care a person may need after an accident or injury. For-profit care needs to have a balance of providing the less profitable care along with the more profitable care. Please see my comments in a separate email which explain in more detail.