I am at the Director of Rehabilitation at Garden City Hospital in Garden City, Michigan. We are the experts at taking care of patients who have functional loss. The criteria for Inpatient Rehabilitation Facilities (IRFs) should be based on functional ability, not diagnosis criteria. Many co-morbidities impact the functional ability of the patient.

Patients who have had significant functional loss from brain injury, spinal cord injury, debility, stroke, neurological impairments, multiple trauma, fractured hips, cardiac bypasses surgeries and respiratory problems are among the people that really benefit from an intensive inpatient program.

We pre-assess them beforehand and are able to return them back to the community in about twelve days. They do much better with the length of stay than going to a nursing home, no matter what it is called. Inpatient Rehab facilities do not admit people that cannot participate in the rigorous three hours of individual therapy five out of seven days. In an intensive rehab program, there is 1:1 patient: therapy that is specifically geared to the needs of the patient.

We provide 24 hour rehabilitation nursing that practices the skills with the patients that they have learned in therapy, so they can achieve their goals faster. The Rehab nurses manage the changes in a patient's treatment plan based upon observation to achieve the best outcome for the patient. Management involves assessment, diagnosis, implementation of skilled interventions, evaluation of a patient's response, and changes to the plan of care based upon the evaluation.

The Rehab physician sees the patient every day to address pain issues and functional progress. We also have medical physicians that also evaluate and assess on a daily basis the patients' medical problems.

Patients are very upset when they are denied access to inpatient rehabilitation services and must go to a nursing home. The atmosphere is entirely different at an IRF. We provide encouragement, support and push the patients to achieve their goals. We are working to help them go home as soon as possible.

Please reconsider the criteria. The current criteria are based on guidelines from 1984, when medicine was practiced differently. Thank you.

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