I would like to comment on the criteria.

- Patients are being sent to skilled nursing because physicians are tired of being told that the patient does not meet the 13 diagnostic criteria and the conditions of participation. They just follow the line of least resistance.
- Physicians are being frustrated by the constant questioning of their medical judgment when deciding where there patients should go for treatment.

To alleviate these problems the criteria should be functionally based with clear guidelines to eliminate these frustrations. Use of the FIMS would help with these guidelines. A committee of experts should be convened to establish the functional guidelines.

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