

## Pfeiffer, Nadine

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**Sent:** Monday, October 28, 2019 2:54 PM  
**To:** Conley, Azzie  
**Cc:** Pfeiffer, Nadine  
**Subject:** [External] IRF regulations

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Hello Azzie,

The rehabilitation rules have been reviewed and the updated version is now posted at <https://files.nc.gov/ncoah/documents/files/Volume-34-Issue-06-September-16-2019.pdf>

On the rule below (p 480), one of our members has commented “This is almost impossible in some rural areas of the state that provide inpatient rehab due to the lack in and access to these providers. The units in these areas may use licensed clinical counselors instead. Wording such as these may preclude rural and community based inpatient rehabs from providing this service line to and for their community.”

### **10A NCAC 13B .5412 ADDITIONAL REQUIREMENTS FOR TRAUMATIC BRAIN INJURY PATIENTS**

**(2) The facility shall provide the consulting services of a neuropsychologist.**

As this is another of the rules that are ideally addressed by CMS and/or Accreditation bodies, is this a change that can be considered under the current timetable for periodic rule review?

thanks

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