

November 15, 2019

Received DHSR 11/15/19

Ms. Nadine Pfeiffer
DHSR Rules Coordinator
809 Ruggles Drive
2701 Mail Service Center
Raleigh, NC 27699-2701

Re: SECTION .5412(2) - COMPREHENSIVE INPATIENT REHABILITATION

Dear Ms. Pfeiffer:

NCHA represents 130 hospitals and health systems in North Carolina and we thank you for the opportunity to comment on the Proposed Rule changes to Chapter 13B, Licensing of Hospitals, as found in the Proposed Rules Section of the September 16, 2019 issue of the North Carolina Register.

Section .5412 (2) of the Section "Additional Requirements for Traumatic Brain Injury Patients," includes a requirement that the facility *"shall provide the consulting services of a neuropsychologist."* This requirement is not consistent with CMS requirements for inpatient comprehensive rehabilitation providers of traumatic brain injury (TBI) services. Further, obtaining a consult from a provider with these qualifications will be difficult or impossible for TBI service providers in some rural areas of the state because of the lack of access to neuropsychologists.

Section .5412 (2) is one of several inpatient rehabilitation rules for traumatic brain injury and spinal cord injury services that NCHA has requested be re-considered as part of the rules review process. NCHA suggests that this requirement either be removed or modified to require "the provision of clinical counseling," without mandating a credential for the provider of the service.

Thank you for your consideration of our comments. Please contact Mike Vicario (mvicario@ncha.org) or myself if you have questions or concerns.

Sincerely,



Stephen J. Lawler
President
North Carolina Healthcare Association

