



**WESTERN CONNECTICUT
HEALTH NETWORK**

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Via Email: Kimberly.Martone@ct.gov

September 29, 2015

Kimberly R. Martone
Director of Operations
Department of Public Health
Office of Health Care Access
410 Capitol Avenue: MS#13HCA
P.O. Box 340308
Hartford, CT 06134-0308

Re: Notification of Norwalk Hospital's DRG excluded Inpatient Rehabilitation Unit (IRF Unit)

Dear Ms. Martone,


Norwalk Hospital has operated an inpatient rehabilitation unit ("IRU"), reimbursed by the Centers for Medicaid and Medicare Services (CMS) under the CMS inpatient rehabilitation facility prospective payment system (IRF PPS) (CCN:07-T034) and therefore excluded from the CMS Diagnosis-related group (DRG) reimbursement. CMS requires (at 42 CFR 412.29(g)) in part, that in order for the hospital to receive reimbursement as an inpatient rehabilitation facility under the IRF PPS, the hospital must "[h]ave a director of rehabilitation who – (1) Provides services to the IRF hospital and its inpatients on a full time basis or, in the case of a rehabilitation unit, at least 20 hours per week." On June 26, 2015, Norwalk Hospital notified CMS via letter, that effective July 22, 2015, the hospital would no longer have a director for its rehabilitation unit as required for reimbursement under the IRF PPS. Subsequently, Norwalk Hospital rescinded its June 26th letter, and on July 21, 2015 notified CMS that "Norwalk will continue its diligent search for an IRU medical director, and ... will notify CMS upon filling the position."

CMS responded on July 22, 2015 that it would allow Norwalk Hospital *until* October 1, 2015 to fill the vacant director of rehabilitation position. The July 22, 2015 letter from CMS also stated: *"CMS is required to terminate Norwalk Hospital's 12-bed Inpatient Rehabilitation Unit (IRF) (CCN:07-T034) and change the status from excluded to non-excluded effective October 1, 2015, if you have not filled the director of rehabilitation position prior to that date."* The Connecticut Department of Public Health (DPH) was copied on that letter.

Norwalk Hospital is not able to meet the requirements for a director of rehabilitation by October 1, 2015 and CMS will terminate Norwalk Hospital's status as an IRU excluded from DRG reimbursement effective October 1, 2015. DPH will be notified of this final determination. This designation is purely a CMS reimbursement designation. Norwalk Hospital has provided and will continue to offer rehabilitation services to inpatients on its non-excluded inpatient medical/surgical units.

Please do not hesitate to contact me if you have comments or questions.

Sincerely,



Sally F. Herlihy
Vice President, Planning