



2022 Policy Priorities

1. Long-Term Impact of COVID-19

- a. Build Awareness among Policymakers of Need for Post-COVID Rehabilitation
- b. Maintain and Increase Access to Rehabilitation for Post-COVID Patients

2. Expansion of Telehealth and Telerehabilitation

- a. Preserve Expansion of Telehealth and Telerehabilitation to Increase Access to Care for People with Impairments
- b. Ensure Patients Have Access to In-Person Services when Such Services are Medically Necessary or Preferred by the Patient
- c. Ensure Health Equity through Safeguards that Prioritize In-Person Care and Treat Telehealth and Telerehabilitation as a Supplemental Option

3. Medicare Post-Acute Care Reforms

- a. Highlight Restrictions in Access to Rehabilitation Therapy Services in All Settings of Care
- b. Call for Timely Release of Data on Rehabilitation Access and Utilization
- c. Oppose Review Choice Demonstration for Inpatient Rehabilitation Facilities
- d. Increase Flexibility with the Three-Hour Rule for IRFs (*Access to Inpatient Rehabilitation Therapy Act*)
- e. Ensure Unified Post-Acute Payment Reform Addresses Needs of All Patients
- f. “Reset” Timeline for IMPACT Act Implementation
- g. Refine Documentation of IRF Medical Necessity
- h. Monitor Developments with Post-Acute Care Value-Based Purchasing Efforts to Ensure Patient Access is Protected

4. Integrity of Essential Health Benefits (EHB) Package

- a. Strengthen EHB and Insurance Protections through ACA Legislation
- b. Monitor and Respond to HHS on Future Regulation of Rehabilitative Services and Devices
- c. Respond to Medicare Advantage Call Letter and ACA Plan Regulations [Notice of Benefit and Payment Parameters; Non-discrimination provisions (Sec. 1557)]
- d. Advocate for Rollback of Short-Term, Limited-Duration and Other Inadequate Coverage Options

5. Access to Rehabilitation in Medicare Advantage, Medicaid, other Federal Programs, and Private Insurance

- a. Limit Overuse and Misuse of Prior Authorization and Proprietary Guidelines
- b. Ensure Network Adequacy Requirements Are Met
- c. Ensure Robust Access to Medically Appropriate Rehabilitation for Complex Conditions

6. Responses to Future Regulations

- a. Respond as Appropriate to IRF PPS, SNF PPS, Home Health PPS, Physician Fee Schedule Proposed Rules