2023 Policy Priorities

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

2. Access to Rehabilitation in Medicare Advantage, Medicaid, other Federal Programs, and Private Insurance
   a. Advocate for Equitable Access to Benefits in Medicare Advantage and Original Medicare
   b. Ban Overuse and Misuse of Prior Authorization and Proprietary Guidelines
   c. Ensure Network Adequacy Requirements Are Met
   d. Ensure Robust Access to Medically Appropriate Rehabilitation for Complex Conditions
   e. Advocate for Better Data to Compare Rehabilitation Outcomes across Populations, Sites, and Payers
   f. Support Expanded Research into Impact of Therapy Caps on Patient Outcomes

3. PHE Unwinding and Long-Term Impact of COVID-19
   a. Ensure Access to Rehabilitation Care is Protected as PHE Flexibilities Lapse
   b. Build Awareness among Policymakers of Need for Post-COVID Rehabilitation
   c. Maintain and Increase Access to Rehabilitation for Long COVID Patients

4. Expansion of Telehealth and Telerehabilitation
   a. Preserve Expansion of Telehealth and Telerehabilitation after PHE Expiration 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
   d. Ensure Appropriate Reimbursement for Telehealth Services to Maintain Access
5. **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 ACA Plan Regulations
   d. Advocate for Rollback of Short-Term, Limited-Duration and Other Inadequate Coverage Options

6. **Responses to Future Regulations**
   a. Respond as Appropriate to IRF PPS, SNF PPS, Home Health PPS, and Physician Fee Schedule Proposed Rules