



## **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