

January 25, 2024

Commissioner Brooke Cunningham  
Minnesota Department of Health – Commissioner’s Office  
625 N. Robert Street  
St. Paul, MN 55155

Delivered electronically to: [health.pir@state.mn.us](mailto:health.pir@state.mn.us)

**Re: Nobis Rehabilitation Partners Proposed 60-bed Freestanding Inpatient Rehab Hospital**

Dear Commissioner Cunningham,

Thank you for the opportunity to provide comments through the public interest review process on the proposal submitted by Nobis Rehabilitation Partners to establish a 60-bed freestanding inpatient rehabilitation hospital in Roseville, Minnesota.

We have four main concerns of the impacts the proposed project would have on our patients and inpatient rehab services. A for-profit, freestanding inpatient facility will have the ability to accept or deny referrals, stifle the ability of nonprofit providers to grow rehabilitation services, would not be subject to the same community benefits that nonprofit providers prioritize, and would have an impact on an already strained healthcare workforce.

*Ability to Accept and Deny Patients*

Rehabilitation services provided in acute care settings, like at North Memorial Robbinsdale, accept all patients, regardless of their ability to pay and have a number of specialty services available in-house that our rehabilitation care team has the opportunity to collaborate with in real-time. A freestanding rehabilitation hospital would have significantly more flexibility in choosing who is admitted into their inpatient services and limited access to diverse specialties that are present in acute care hospitals, particularly level one trauma hospitals. In recent years we have seen significantly more challenges and increased barriers in discharging complex patients to post-acute care facilities, which is exacerbated with new facilities and providers that have the ability to choose which patients they admit. Growth in rehabilitation services should be prioritized in organizations that accept all patients, regardless of their payer or ability to pay.

*Potential to Stifle Growth and Sustainability for Current Nonprofit Providers*

As providers across the state and country are adapting to the long-term impacts of COVID19 and deploying new and creative strategies to business sustainability and growth, the state should consider supporting growth to meet the needed demand in Minnesota’s existing

providers. While we have identified an opportunity for growth in rehabilitation services at North Memorial Robbinsdale, the current demand we see through our facility does not support a significant expansion with an additional 60 beds in the twin cities metro area. Expanding services to that level could further strain the sustainability of existing services at acute care and trauma hospitals.

#### *Community Benefit*

As a nonprofit provider, we are proud to continue to invest in our community and meet the requirements to maintain our nonprofit status including offering generous charity care policies, significant discounts for uninsured patients, and reinvesting back into the community. If this project moves forward, there should be an expectation to invest back into the community, including but not limited to investments in community benefits, charity care and financial assistance programs, regardless of the owner and operators' business status.

#### *Impact to an Already Strained Workforce*

We are currently experiencing workforce shortages across various areas of health care providers. And while we strive to minimize vacancies across our health care system, recruiting and retention is very complex and particularly challenging in the current, post-pandemic environment. There are economies of scale achieved with rehabilitation services provided in an acute care hospital and competing with a freestanding rehabilitation hospital would add additional strain to staffing a diverse care team within our hospital rehab unit. Without a plan and commitment to increase the overall workforce availability along with the new inpatient beds, the resource and talent challenges we all face today will only worsen.

Again, thank you for the opportunity to comment on this project. Please feel free to reach out with any additional questions.

Sincerely,

Trevor Sawallish  
Chief Operating Officer and Interim Chief Executive Officer  
North Memorial Health

*North Memorial Health (NMH) is a health system with 2 hospitals, North Memorial Robbinsdale and Maple Grove Hospital, and over 20 associated clinics including primary, specialty, and urgent care and an expansive statewide medical transportation division. We employ over 6,000 team members, serving over 55,000 patients per month. North Memorial Health serves a significant portion of Minnesotans on government sponsored insurance with both of our hospitals serving a disproportionate share of Medical Assistance and Medicare enrollees. Our mission driven organization strives to deliver high-quality, low-cost care to all patients regardless of their ability to pay.*