

Clarification as to whether the post-admission physician evaluation may serve as one of the three required rehabilitation physician visits in the first week.

No. The post-admission physician evaluation and the required minimum of three face-to-face rehabilitation physician visits per week serve different purposes, and the requirements may not be combined.

The post-admission physician evaluation documents the patient's status on admission and provides the rehabilitation physician with the necessary information to begin development of the patient's overall plan of care. The ongoing rehabilitation physician visits ensure that the patient's medical status and functional status are being continuously monitored as the patient's overall plan of care is being carried out, so that the patient can ultimately achieve his or her highest functional recovery. One of the requirements of the minimum three rehabilitation physician visits per week is to assess the patient's functional goals and progress in light of the patient's medical conditions. We do not believe that a rehabilitation physician can do a meaningful assessment of the patient's progress in light of the intensive rehabilitation therapy program before the patient has received at least one full day's worth of intensive rehabilitation therapy.