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**Samaritan Health Services comments on CMS Revised Version of the Important Message from Medicare (IM) (CMS-R-93).**

Samaritan Health Services is a network of non-profit hospitals, physician clinics, senior care facilities and health plans serving Oregon's Mid-Willamette Valley and Central Oregon Coast. This letter serves as Samaritan's public comments on the CMS proposed Revised Version of the Important Message from Medicare (IM) (CMS-R-93).

As published, the revised rule sets forth requirements for how hospitals must notify Medicare beneficiaries who are hospital inpatients about their discharge appeal rights. While CMS was well intentioned in proposing this rule in response to concerns raised by advocacy groups with respect to hospital discharge planning processes, Samaritan Health Services believes this rule will pose several challenges.

Samaritan Health Services has three comments:

First, it is the opinion of Samaritan Health Services that the proposed Revised Version will create a duplication of already existing efforts to provide patients with the Important Message from Medicare. Patients are already provided with the Important Message from Medicare upon admission. Further, the average length of stay (LOS) for patients is 4 to 5 days. It is our opinion that it would be redundant and potentially create confusion to provide a patient whose LOS is 4 days with the Important Message on day one and again two days later.

Second, the provision would further require that the second copy of the Important Message be given again two days prior to discharge. Samaritan Health Services believes that it could not in good faith accurately and consistently estimate the discharge date of a patient, and therefore could not ensure the two-day period be met consistently.

Third, Samaritan Health Services believes that the provision would create an additional burden of expense and staffing in the areas of monitoring a patient's LOS to ensure the two-day prior to discharge mandate is met; providing a secondary form to patients or their representative and the cost of the form itself.

Samaritan Health Services appreciates the opportunity to provide additional comment regarding the CMS Revised Version of the Important Message from Medicare.

Submitted by:

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**Samaritan**  
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