

March 2, 2007

CMS, Office of Strategic Operations
and Regulatory Affairs
Division of Regulations – C
Attention: Bonnie L. Harkless
Room C4 – 26 – 05
75700 Security Blvd.
Baltimore, MD 21224-1850

Dear Ms. Harkless

The details of the proposed Medicare IM process have been reviewed by members of the Yale-New Haven Hospital staff. We understand and agree with the need to keep patients and their families involved in the process of care toward discharge. The obtaining of a patient's or responsible party's signature upon admission on the Medicare IM will present challenges, but not unmanageable ones.

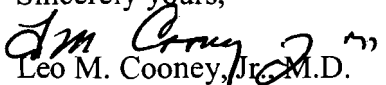
The major logistical problem that we have with this proposed requirement is the need to reissue the signed Medicare IM document back to the patient within 48 hours of discharge. While we believe that providing this notice to the patient is reasonable, we do not know why it has to be the same document signed by the patient.

We believe that it would be much more reasonable to supply another copy of this document to the patient. The requirement to deliver the original signed document to the patient's floor and to the patient will be quite costly and difficult for our hospital staff. Another copy of that document could be provided in a much more efficient manner. This would give the patient and the patient's family the requisite information that they will need prior to discharge. The signed initial document could then be kept with the patient's record for review if necessary. We would then document receipt of the second message to the patient.

We believe that this revised process would deliver the needed information to the patient and patient's family with far less administrative and personal cost to the Hospital.

Thank you for your consideration regarding this matter.

Sincerely yours,


Leo M. Cooney, Jr., M.D.
Director, Utilization Review
Yale-New Haven Hospital