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Conditions of Participation for Comprehensive Outpatient Rehabilitation Facilities (CORFs) (CMS-10282)

Comment On: CMS-2026-0331-0001

Conditions of Participation for Comprehensive Outpatient Rehabilitation Facilities (CORFs) (CMS-10282)

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Comment on CMS-2026-0331-0001

Submitter Information

Name: Nakul Karkare

Address:

Lake Success, NY, 11020

Email: office@cortho.org

Phone: 6319812663

General Comment

Utilization review under 42 CFR 485.66 depends entirely on the integrity of the underlying procedure coding. When two CORFs furnishing identical rehabilitative services can legitimately assign different codes for the same encounter, utilization patterns become impossible to compare across facilities. Annual reviews flag noise. Outliers are buried. The burden of review compounds because the data itself is unreliable.

I have developed a deterministic procedure coding system that removes facility-level variation entirely. Every code derives automatically from documentation already captured at the point of care. No facility discretion. No subjective selection. Same service, same code — across every CORF, every time.

This makes cross-facility utilization review faster, cheaper, and genuinely meaningful. Burden hours drop. Comparisons become valid. Anomalies become real signals rather than artifacts of coding inconsistency.

The system is complete, tested, and available without licensing fees.

Nakul Karkare MD

www.newyorkhipknee.com

www.cortho.org