



Brain Injury Alliance

C O L O R A D O

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Re: Comments on the Essential Health Benefits Benchmark Plan for Colorado

The Brain Injury Alliance of Colorado (BIAC) is the only statewide non-profit exclusively dedicated to brain injury. BIAC is dedicated to improving the quality of life for people with brain injuries by connecting survivors with resources to help navigate the path of rehabilitation. The following comments are provided on behalf BIAC and the over 100,000 Coloradans living with the effects of a brain injury regarding the selection of a benchmark plan for Colorado's essential health benefits (EHB).

Considerations with the Specific Benchmark Plans

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In considering the 9 plans, we paid particular attention to the following benefits that are of high importance to the brain injury community:

- Hospital Inpatient Care including inpatient rehabilitation
- Drugs, Supplies and Supplements
- DME
- Home Healthcare
- Mental Health Services
- PT, OT, ST Rehab
- Skilled Nursing Care Facility

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Gavin Attwood

We recognize that some plans have better benefits in one area but are worse in another, making it difficult to pick a favorite. BIAC is strongly opposed to Plan C due to the limit of 30 days on inpatient rehabilitation services. Experience has shown us that individuals who have suffered a brain injury typically require significantly more inpatient rehabilitation in order to help the patient recover from a major injury.

BIAC's first preference is Plan B. This plan uses 'medical necessity' as the criteria for inpatient rehabilitation treatment rather than annual day limits on rehabilitation. Day limits do not serve those with a severe brain injury and can result in individuals and families spending down their savings and retirement on medical bills resulting in medical bankruptcy.

Habilitation Services

BIAC's position on Habilitation Services is that these services are offered in addition to rehabilitation services. It is critical that individuals who have suffered a brain injury are given the maximum opportunities to receive rehabilitation and habilitation services in order to assist them in their recovery. Recovery that may be slow but ultimately can result in the injured person returning to the community and employment. BIAC's position is consistent with CCHI's comments on Habilitation Services that have been submitted.

Our recommendations are consistent with those of Craig Hospital.

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