

May 31, 2022

Administrator Chiquita Brooks-LaSure
Centers for Medicare and Medicaid Services (CMS)
Department of Health and Human Services
Attention: CMS–1767-P
P.O. Box 8016
Baltimore, MD 21244–1816

RE: CMS–1767-P - Medicare Program; Inpatient Rehabilitation Facility Prospective Payment System for Federal Fiscal Year 2023 and Updates to the IRF Quality Reporting Program; published at Vol. 87, No. 66 Federal Register 20218-20266 on April 6, 2022.

Submitted electronically via <http://www.regulations.gov>

Dear Administrator Brooks-LaSure,

UnityPoint Health appreciates this opportunity to provide comments on this proposed rule related to Inpatient Rehabilitation Facility (IRF) rates, quality reporting and value-based purchasing. UnityPoint Health is one of the nation’s most integrated health care systems. Through more than 32,000 employees and our relationships with more than 480 physician clinics, 40 hospitals in metropolitan and rural communities, 14 home health agencies, and 7 IRFs, UnityPoint Health provides care throughout Iowa, central Illinois, and southern Wisconsin. On an annual basis, UnityPoint Health provides a full range of coordinated care to patients and families through more than 8.4 million patient visits.

UnityPoint Health appreciates the time and effort of CMS in developing this proposed rule. We respectfully limit our comments to the health equity request for information.

REQUEST FOR INFORMATION - HEALTH EQUITY

CMS is requesting feedback from stakeholders on the development and inclusion of health equity quality measures for the IRF Quality Reporting Program.

Comment: As part of an integrated health system, UnityPoint Health is committed to diversity, equity, and inclusion (DEI) at all levels of the organization. We applaud CMS for prioritizing health equity within each of its annual prospective payment system rules to assure alignment across settings of care and for soliciting input from stakeholders regarding implementation and measurement. As many IRFs are likely at different stages of their health equity journey, we respectfully suggest that CMS deploy a phased approach to measuring and implementing health equity strategies, to carefully evaluate underlying data collection burden and accuracy, and to begin with a rewards or incentive program instead of a punitive system for performance. UnityPoint Health will be submitting more detailed feedback on this request for information within our formal comment letter to *CMS–1771–P: Hospital Inpatient Prospective Payment Systems for Acute Care Hospitals and the Long-Term Care Hospital Prospective Payment System and*

Proposed Policy Changes and Fiscal Year 2023 Rates proposed rule. We request that CMS also review that comment letter for applicable to this setting as well.

We are pleased to provide input on this request for information and its impact on our IRFs, patients and communities. To discuss our comments or for additional information on any of the addressed topics, please contact Cathy Simmons, Government & External Affairs at Cathy.Simmons@unitypoint.org or 319-361-2336.

Sincerely,

A handwritten signature in cursive script that reads "Cathy Simmons".

Cathy Simmons, JD, MPP
Executive Director, Government & External Affairs
UnityPoint Health