

### Rural Health Panel

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Centers for Medicare and Medicaid Services  
Department of Health and Human Services  
Attention: CMS-9972-P  
P.O. Box 8012  
Baltimore, MD 21244-1850  
By electronic submission at <http://www.regulations.gov>

RE: CMS-1771-P: Medicare Program: Hospital Inpatient PPS for Acute Care Hospitals and the Long-Term Care Hospital PPS and Proposed Policy Changes and Fiscal Year 2023 rates; Quality Programs and Medicare Promoting Interoperability Program Requirements for Eligible Hospitals and Critical Access Hospitals

The Rural Policy Research Institute Health Panel was established in 1993 to provide science-based, objective policy analysis to federal lawmakers. The Panel is pleased to offer comments in response to the Changes to Hospital and Critical Access Hospital Conditions of Participation. Our comment is specific to reporting screening for social drivers of health.

### Centralized Focus on Equity

The Panel endorses requiring reporting the use of screening for social drivers of health. Hence, we recommend CMS consider investments in programs such as Accountable Health Communities to provide resources and guidance for hospitals to act on the results of the screening measures. Data generated by screening could be useful to the hospitals, communities, and states. We do not endorse reporting the screening rates as a quality measure. The screening results do not measure actions taken by the hospitals, but are instead reflections of total community (and state) efforts to address the five domains of the social drivers of health.

Respectfully submitted,



Keith J. Mueller, Ph.D.  
Chair, RURPI Health Panel