



QUALITY IS OUR IMAGE

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June 16, 2022

Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare and Medicaid Services  
The U.S. Department of Health and Human Services  
Attention: CMS-1771-P  
Hubert H. Humphrey Building  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

**RE: Medicare Program; 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 Rate**

Dear Administrator Brooks-LaSure:

The American College of Radiology (ACR), representing nearly 40,000 diagnostic radiologists, interventional radiologists, radiation oncologists, nuclear medicine physicians and medical physicists, appreciates the opportunity to provide comments on the fiscal year (FY) 2023 Hospital Inpatient Prospective Payment Systems (IPPS) proposed rule. The ACR will be providing comments on the following proposals:

- Proposed Supplemental Payment for Indian Health Service and Tribal Hospitals and Puerto Rico Hospitals for FY 2023 and Subsequent Fiscal Years
- Overarching Principles for Measuring Healthcare Quality Disparities Across CMS Quality Programs—Request for Information

**Proposed Supplemental Payment for Indian Health Service and Tribal Hospitals and Puerto Rico Hospitals for FY 2023 and Subsequent Fiscal Years**

*Proposal*

CMS proposes that Indian Health Services (IHS)/Tribal hospitals and hospitals in Puerto Rico receive a special supplemental uncompensated care payment linked to the uncompensated care payments they are receiving in a base year. CMS proposals includes a proposal to establish a new supplemental payment for IHS/Tribal hospitals and hospitals located in Puerto Rico, recognizing that the proposal to discontinue the use of the low-income insured days proxy to calculate uncompensated care payments for these hospitals could result in significant financial disruption.

*ACR Perspective and Comments*

The ACR supports CMS's proposal to establish a new supplemental payment for IHS and hospitals located in Puerto Rico. The low wage index for Puerto Rico has negatively impacted Puerto Ricans access to healthcare services. The ACR remains extremely concerned about the health disparities experienced in

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Puerto Rico. The ACR will continue to work with CMS and stakeholders to improve health equity in Puerto Rico.

## **Overarching Principles for Measuring Healthcare Quality Disparities Across CMS Quality Programs—Request for Information**

### *Proposal*

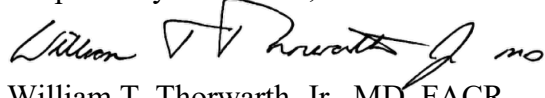
CMS has highlighted the reduction in healthcare disparities as one of the aspects to improve health equity. Measuring healthcare disparities and reporting results to healthcare providers is a cornerstone of our approach to advancing healthcare equity. CMS seeks input on methods for advancing measurement and stratification as tools to address health care disparities and advance health care equity across hospital quality and value-based purchasing programs.

### *ACR Perspective and Comments*

The ACR is committed to working with CMS and other stakeholders to promote health equity. The ACR is a member of the Radiology Health Equity Coalition<sup>1</sup> which mission is to positively impact health care equity in the radiology field and beyond. The Coalition aims to address the systemic challenges in the practice of radiological care to reduce existing inequities for historically medically underserved communities. The Coalition will collect, assess, and disseminate resources and best practices, advocate for and connect with patients and community members, and collaborate on programs and services to improve access and utilization of preventative and diagnostic imaging. Well-known disparities in access to screening and high-value imaging care for uninsured and marginalized populations must be improved. The Coalition is taking on this challenge by developing the gaps analysis and data at the community level while empowering radiologists in those communities to partner locally to make transformational change.

The ACR appreciates the opportunity to comment on the FY 2023 IPPS proposed rule. We hope you find these comments provide valuable input for your consideration. If you have any questions, please do not hesitate to contact Christina Berry Team Lead Economic Policy at [cberry@acr.org](mailto:cberry@acr.org)

Respectfully Submitted,



William T. Thorwarth, Jr., MD, FACR  
Chief Executive Officer

cc: Julia Venanzi, CMS  
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<sup>1</sup> <https://www.radhealthequity.org/>