

June 5, 2023

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, D.C. 20201

Re: Medicare Program; FY 2024 Inpatient Psychiatric Facilities Prospective Payment System—Rate Update ([IPF PPS](#)), CMS–1783–P

Submitted electronically via Regulations.gov

Dear Secretary Becerra:

The undersigned are national organizations representing consumers, family members, mental health and addiction providers, advocates, and other stakeholders committed to strengthening Americans' access to mental health and addiction care. As trusted leaders in the field, we are pleased to submit the following comments on the proposed rule for the FY 2024 Medicare Inpatient Psychiatric Facilities (IPF) Prospective Payment System. **We encourage CMS to finalize the proposal to add health equity measures and a patient experience of care survey measure to the IPF Quality Reporting Program (IPFQR).**

Unfortunately, it has been well documented that the overall quality of mental health care in the United States is quite poor compared to other medical conditions. We believe the IPFQR program has great potential to incentivize IPFs to improve the quality of mental health care delivered in inpatient settings, given the financial penalty for not participating in the program. Specifically, psychiatric hospitals and psychiatric units that do not comply with quality data submission requirements under the IPFQR Program see their Medicare payment rate update reduced by 2 percentage points.

Health Equity Quality Measures

Given the significant disparities in mental health care, outlined so comprehensively in the proposed rule, we believe the addition of a health equity and social drivers of health quality measures will help IPFs focus on empowering their workforce to recognize and eliminate health disparities. Therefore, we encourage CMS to finalize the proposals to:

- Adopt the *Facility Commitment to Health Equity measure* for the FY 2026 and beyond.
- Adopt the *Screening for Social Drivers of Health measure* with voluntary reporting of in CY 2024 with required reporting for the FY 2027 payment determination and subsequent years,
- Adopt the *Screen Positive Rate for Social Drivers of Health measure* beginning with voluntary reporting of data beginning in CY 2024 with required reporting for the FY 2027 payment determination and subsequent years.

Patient Experience of Care

We are delighted to read that CMS believes “that a comprehensive approach to quality must include directly reported feedback regarding facility, provider, and payer performance.” We agree and believe that adding a patient experience of care survey, the Psychiatric Inpatient Experience (PIX) survey, will help put the patient at the center of conversation, by incentivizing IPFs to value how patients view the care

they receive. Having this information publicly available will also help individuals compare IPFs based on patient experiences of care, as is currently possible to do when comparing acute care hospitals. The PIX survey was developed by a team at Yale New Haven Psychiatric Hospital to address the gap in available experience of care surveys for the IPF setting. We appreciate that in developing the PIX, they used patient focus groups and sought the input patient and family advisory council. We think the input of people with mental illness and their families is critical to the overall effectiveness of any survey. Therefore, we encourage CMS to finalize the proposal to:

- Adopt the *Psychiatric Inpatient Experience (PIX) survey* to measure patient experience of care in the IPF setting beginning with voluntary reporting of CY 2025 data and beginning with required reporting of CY 2026 data for the FY 2028 payment determination.

Thank you for the opportunity to comment on this important proposal. We believe the addition of these quality measures will greatly improve the overall IPFQR Program and further incentivize improvements in the quality of care delivered in these facilities. We encourage CMS to finalize these proposals. If you have any questions, or would like to discuss, please contact Jennifer Snow, NAMI's National Director of Government Relations and Policy at jsnow@nami.org or Mary Giliberti, MHA's Chief Policy Office at mgiliberti@mhanational.org.

Sincerely,

American Association for Psychoanalysis in Clinical Social Work
American Association on Health and Disability
American Foundation for Suicide Prevention
American Psychological Association
Anxiety and Depression Association of America
Association for Ambulatory Behavioral Healthcare (AABH)
Depression and Bipolar Support Alliance
Employee Assistance Professionals Association
Inseparable
Lakeshore Foundation
Maternal Mental Health Leadership Alliance
Mental Health America
National Alliance on Mental Illness (NAMI)
National Health Law Program
National League for Nursing
Psychotherapy Action Network
The Kennedy Forum

CC: Dr. Miriam Delphin-Rittmon, Ph.D., Assistant Secretary for Mental Health and Substance Use Chiquita Brooks-LaSure, Administrator, Centers for Medicare & Medicaid Services