

(Insert Date)

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1694-P
P.O. Box 8011
Baltimore, MD 21244-1850

Re: Comment on the FY 2020 IPPS Proposed Rule Designation

To Whom We May Address:

Thank you for allowing us the opportunity to submit comments regarding the proposed IPPS rules for FY 2020. (Insert name of institution here) is grateful for the efforts of your organization to improve the nation's health, and for your willingness to review additional information during the public comment period before issuing your final rules. It's clear that great time and effort was invested in the proposed rule, and we appreciate and recognize this work of public service.

(An appreciation letter that endorses changes found in the IPPS that you believe will improve healthcare and patient outcome. The text below is a sample. We encourage you to add/subtract and comment on any particular part of the rule supported by your institution.)

There is much in the proposed rule that we consider to be positive. For example, we are supportive of the designation of isolated neutropenia (D70.9), phosphorus disorders (E83.39), cor pulmonale (I27.81), fecal impaction (K56.41), and hypocalcemia (83.51) as CC's, recognizing the clinical implications of these conditions. We also support the of changes in MCC/CC status for those conditions in which no treatment is required over and above conservative care, such as fractures of the pubis and trochanters (S32.x and S72.x series in the proposed rule.

We are also supportive of the drive to recognize social determinants of health as significant drivers of patient care needs. We thank you for the addition of code Z59.0, "homelessness," to the list of designated CC's. We hope that in the future, CMS will recognize that impact of other social determinants of health that directly impact the health of the patient and public in general.

Clinical Documentation Integrity programs often work hand-in-hand with hospital Quality Departments to ensure that patients included in quality measures are appropriate for study. Given the current concerns over opioid use, we support the addition of the opioid-related quality measures within the proposed rule. Similarly, we are supportive of plans to adjust disparities between high and low wage index facilities as well as adjustments for uncompensated care as a way of keeping healthcare accessible to those members of our communities with the greatest need.

Thank you again for your work on behalf of the public.

Sincerely,

(Insert Name, Title, Institution)