

Public Comment 101

A Guide on How to Submit Comments on the 2024 Medicare Physician Fee Schedule (PFS), including Codes for Community Health Integration Services

Proposed Rule: **CMS-1784-P**

Public Comment Closes: September 11, 2023 at 5PM ET

Please note that you can review and comment on any part of the proposed rule. This tutorial is for guidance purposes only. Questions should be directed to the agency and individuals listed in the Proposed Rule document.

Snapshot of this tutorial

1. Introduction to the Proposed Rule
 - Community Health Integration (CHI)
 - Principal Illness Navigation (PIN)
 - Social Determinants of Health (SDOH) Risk Assessment
2. User-friendly instructions on how to complete a public comment
3. Additional resources

Press Release: <https://www.cms.gov/newsroom/press-releases/cms-physician-payment-rule-advances-health-equity>

Fact Sheet on the CY 2024 Physician Fee Schedule proposed rule, please visit: <https://www.cms.gov/newsroom/fact-sheets/calendar-year-cy-2024-medicare-physician-fee-schedule-proposed-rule>

Contributing to equity, inclusion, and access to care for the Medicare population

Services Addressing Health-Related Social Needs (Community Health Integration Services, Social Determinants of Health Risk Assessment, and Principal Illness Navigation Services)

The services described by the proposed codes are the first that are specifically designed to include **community health workers (CHW)**, **care navigators (CN)**, and **peer support specialists (PSS)**.

In Health-Related Social Needs you will find:

- Community Health Integration (CHI) is CHW-specific
- Principal Illness Navigation (PIN) is PSS- and CN-specific
- Social Determinants of Health (SDOH) Risk Assessment covers all of the above workforce categories

CHI and PIN both help to better understand:

- the patient's life story
- care coordination
- contextualizing health education
- building patient self-advocacy skills
- health system navigation, facilitating behavioral change
- providing social and emotional support, and
- facilitating access to community-based social services to address unmet social determinations of health (SDOH) needs

The SDOH risk assessments assess unmet social needs that may impact the provider's ability to treat the patient.



Requests for information in relation to the **CHI**, **PIN**, and **SDOH** sections



Please note that you can review and comment on any part of the proposed rule.

Community Health Integration (CHI) section:

- Whether it would be appropriate to specify the number of hours of required training, as well as the training content and who should provide the training
- Confirm CMS's understanding of where and how these services would be typically provided (e.g., in-person, audio-video, two-way audio)
- Whether CMS should require patient consent for CHI services
- Whether states typically cover services similar to CHI under their Medicaid programs, and whether such coverage would be duplicative of the CHI service codes
- Whether there are other service elements not included in the proposed CHI service codes that should be included or are important in addressing unmet SDOH need(s) that affect the diagnosis or treatment of medical problems, where CMS should consider coding and payment in the future

Principal Illness Navigation (PIN) section:

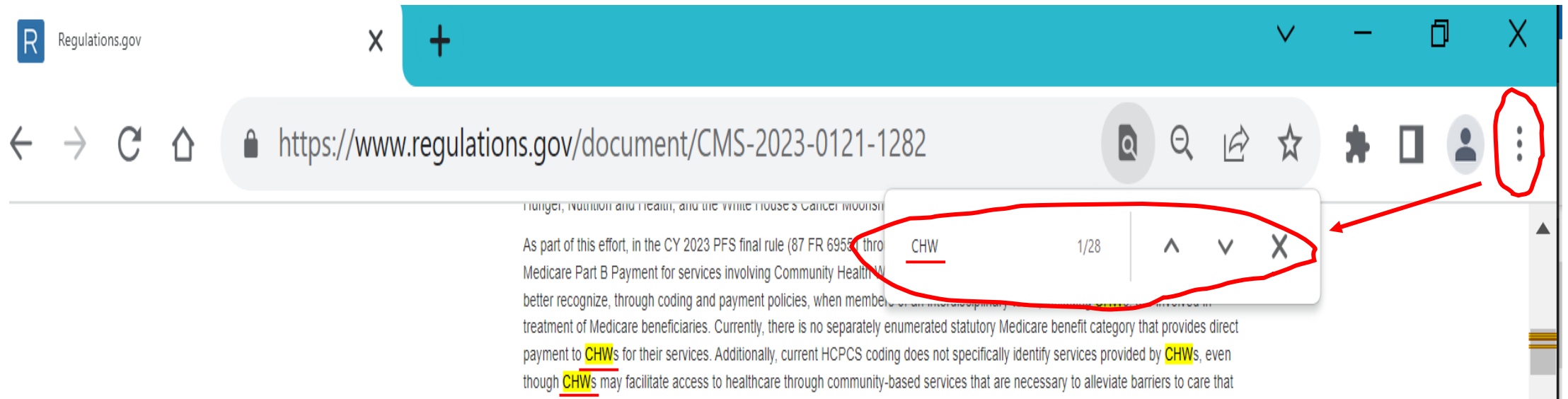
- The number of hours of training required, as well as the training content and who should provide the training
- Confirm CMS's understanding of where and how PIN services would be typically provided (for example, with or without direct patient contact, in-person, using audio-video, using two-way audio; and whether navigators are typically local to the patient)
- Whether CMS should require patient consent for PIN services
- Whether states typically cover services similar to PIN under their Medicaid programs, and whether such coverage would be duplicative of the PIN service codes
- Are there other service elements not included in the PIN service codes that are part of associated care that should be included in the PIN service codes, or are important in navigation for high-risk conditions, where CMS should consider coding and payment in the future

Social Determinants of Health (SDOH) Risk Assessment section

- Whether CMS should require as a condition of payment for SDOH risk assessment that the billing practitioner also have the capacity to furnish CHI, PIN, or other care management services, or have partnerships with community-based organizations (CBO) to address identified SDOH needs
- Comments on where and how these services would be typically provided, along with other aspects of the proposed SDOH assessment service

When you are in the document, here's how to do a keyword search.

- In your browser, click on the three buttons in the toolbar and select “Find”
- A search window will appear
- Enter your keyword(s) in the search bar
- Your search result will show up in the document



Keywords you can use:

(27) Services Addressing Health-Related Social Needs will take you to the beginning of the discussion on CHI, SDOH, and PIN

Other keywords and abbreviations

b. community health integration

d. social determinants of health

e. principal illness navigation

community health worker

care navigator *or* navigator

peer support *or* peer support specialist *or* peer specialist

CHW

CHI (case-sensitive)

PIN (case-sensitive)

Submitting Your Public Comment



Let's get started...



How do I submit a comment on **Regulations.gov**?

An overview with screenshots to follow

- The "Comment" button can be found on the following pages:
 - Docket Details page when a document within the docket is open for comment,
 - Document Details page when the document is open for comment, and
 - Document Search Tab with all search results open for comment displaying a "Comment" button.
- Clicking "Comment" on any of the above pages will display the comment form. You can enter your comment on the form and attach files (maximum of 20 files up to 10MB each).
- Choose whether to identify yourself as an individual, an organization, or anonymously. Be sure to complete all required fields depending on which identity you have chosen. **Please note that information entered on the web form may be viewable publicly.**
- Once you have completed all required fields and chosen your identity, the "Submit Comment" button is enabled.
- Upon completion, you will receive a Comment Tracking Number for your comment.
- Some agencies also accept comments by mail, fax, or email. To find out if you can use one of these alternate methods, visit the document's section labeled "Addresses."
- Users cannot submit comments on documents published by Non-Participating Agencies.

Step 1: Go to www.regulations.gov

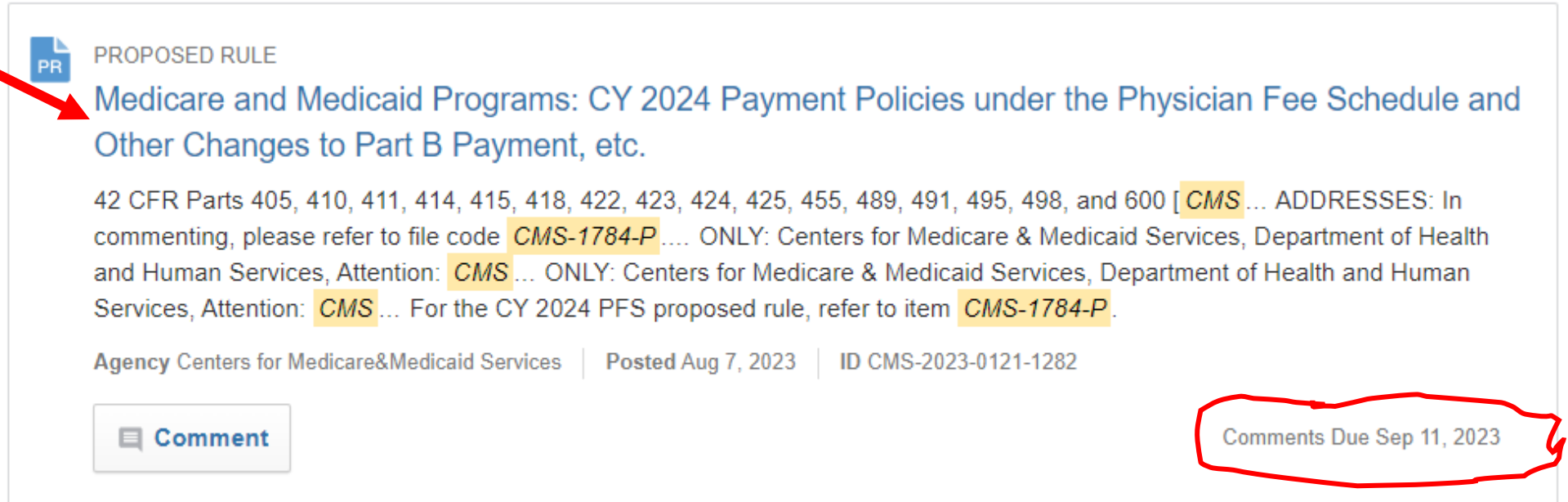
Step 2: In the search bar, enter **CMS-1784-P** and then click “Search”



The image shows a screenshot of the Regulations.gov website header. The header is dark blue with the logo 'Regulations.gov' and the tagline 'Your Voice in Federal Decision Making' on the left. On the right, there is a 'SUPPORT' button. Below the header is a white search bar containing the text 'CMS-1784-P'. To the right of the search bar is a green 'Search' button. A red arrow points to the search bar from the left, and another red arrow points to the 'Search' button from the right.

Step 3: Click the blue-highlighted title that has “**Comments Due Sep 11, 2023**” at the bottom to access the Download button to get the full text of the proposed rule.

The blue highlighted title will be clickable and will take you to the page to **download** the document.



The screenshot shows a regulatory document entry. A red box on the left contains text explaining that the blue title is clickable. A red arrow points from this box to the title. The title itself is blue and includes a 'PR' icon. At the bottom right of the entry, the text 'Comments Due Sep 11, 2023' is circled in red. The main text of the rule is partially highlighted in yellow.

PROPOSED RULE
Medicare and Medicaid Programs: CY 2024 Payment Policies under the Physician Fee Schedule and Other Changes to Part B Payment, etc.

42 CFR Parts 405, 410, 411, 414, 415, 418, 422, 423, 424, 425, 455, 489, 491, 495, 498, and 600 [CMS ... ADDRESSES: In commenting, please refer to file code CMS-1784-P ONLY: Centers for Medicare & Medicaid Services, Department of Health and Human Services, Attention: CMS ... ONLY: Centers for Medicare & Medicaid Services, Department of Health and Human Services, Attention: CMS ... For the CY 2024 PFS proposed rule, refer to item CMS-1784-P .

Agency Centers for Medicare&Medicaid Services | Posted Aug 7, 2023 | ID CMS-2023-0121-1282

Comment

Comments Due Sep 11, 2023

Or you can use this link: <https://www.regulations.gov/document/CMS-2023-0121-1282>

Step 4:

This screen gives you two functions.

Download to see the document, and Comment will take you to the comment form

Regulations.gov
Your Voice in Federal Decision Making

SUPPORT

Docket (CMS-2023-0121) / Document

Comment Period Ends: 32 Days

PROPOSED RULE

Medicare and Medicaid Programs: CY 2024 Payment Policies under the Physician Fee Schedule and Other Changes to Part B Payment, etc.

Posted by the Centers for Medicare & Medicaid Services on Aug 7, 2023

Comment View More Documents (2) View Related Comments (1.46K) Share

Document Details Browse Posted Comments (22)

Document ID
CMS-2023-0121-1282

Comments Received
18

Content

Download File Download

- The document might automatically download and the text will appear on your screen.
- Refer to slides 8 and 9 on how to do a keyword search in the document.

Step 5: Write your comment(s)

IMPORTANT:

Commenter's Checklist provides tips for providing effective comments and detailed recommendations.



Write a Comment

[Commenter's Checklist](#)

Comment*

Start typing comment here...

In commenting, please refer to file code CMS-1784-P.

What is your comment about?

Select a Comment Category

Attach Files

You can attach up to 20 files, but each file cannot exceed 10MB. Valid file types include: bmp, docx, gif, jpg, jpeg, pdf, png, ppt

Drop files here or [Browse...](#)

Step 6: Enter your email address and other demographic information

Email Address



Email Address



Opt to receive email confirmation of submission and tracking number? *(We will never post on Regulations.gov or share your email with anyone else.)*

Tell us about yourself! I am...*



(Select an identity below)



An Individual

If you or another single person is the author



An Organization

A company, organization, or government agency



Anonymous


If you do not want an entity associated with the comment

Step 7: Select “I’m not a robot”

Step 8: Read the Privacy Notice and DO NOT SUBMIT personal information through this form.

Step 9: Click “Submit Comment”

Step 7

 I'm not a robot 
reCAPTCHA
Privacy - Terms

Step 8



Do not submit personally identifiable information through this form. Any personally identifiable information (e.g., name, address, phone number) included in the comment form or in an attachment may be publicly disclosed in a docket or on the Internet (via Regulations.gov, a federal agency website, or a third-party, non-government website with access to publicly-disclosed data on Regulations.gov). By submitting a comment, you agree to the [terms of participation](#) and [privacy notice](#).

Step 9



Submit Comment

Please see the [Privacy Notice](#) and [User Notice](#) regarding comment submission.

Any information (e.g., personal or contact) you provide on this comment form or in an attachment may be publicly disclosed and searchable on the Internet and in a paper docket and will be provided to the Department or Agency issuing the notice. To view any additional information for submitting comments, such as anonymous or sensitive submissions, refer to the [Privacy Notice](#) and [User Notice](#), the Federal Register notice on which you are commenting, and the Web site of the Department or Agency.



Congratulations, you did it!

Helpful Resources

- ✓ CMS Press Release: <https://www.cms.gov/newsroom/press-releases/cms-physician-payment-rule-advances-health-equity>
- ✓ Fact Sheet on the CY 2024 Physician Fee Schedule proposed rule: <https://www.cms.gov/newsroom/fact-sheets/calendar-year-cy-2024-medicare-physician-fee-schedule-proposed-rule>
- ✓ Frequently Asked Questions (FAQs): <https://www.regulations.gov/faq?anchor=downloadingdata>
- ✓ Regulations.gov link to the PFS document: <https://www.regulations.gov/document/CMS-2023-0121-1282>
- ✓ Federal Register link to the PFS document: <https://www.federalregister.gov/public-inspection/2023-14624/medicare-and-medicaid-programs-cy-2024-payment-policies-under-the-physician-fee-schedule-and-other>
- ✓ In general, here's where you can find Rules and other federal documents that have public comments: www.regulations.gov

Please note that you can review and comment on any part of the proposed rule. This tutorial is for guidance purposes only. Questions should be directed to the agency and individuals listed in the Proposed Rule document.

- To be assured consideration, comments must be received at one of the addresses provided below, **no later than 5 p.m. ET on September 11, 2023.**
- In commenting, please refer to file code **CMS–1784–P**
- Comments, including mass comment submissions, must be submitted in one of the following three ways (please choose only one of the ways listed):

1. Electronically.

You may submit electronic comments on this regulation to <http://www.regulations.gov>. Follow the “Submit a comment” instructions.

2. By regular mail.

You may mail written comments to the following address ONLY: Centers for Medicare & Medicaid Services, Department of Health and Human Services, Attention: CMS–1784–P, P.O. Box 8016, Baltimore, MD 21244–8016.

Please allow sufficient time for mailed comments to be received before the close of the comment period.

3. By express or overnight mail.

You may send written comments to the following address ONLY: Centers for Medicare & Medicaid Services, Department of Health and Human Services, Attention: CMS–1784–P, Mail Stop C4–26–05, 7500 Security Boulevard, Baltimore, MD 21244–1850.

Thank you