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August 28, 2025

Dr. Mehmet Oz  
Administrator  
Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services  
7500 Security Blvd.  
Baltimore, MD 21244-1850

***Re: Docket #CMS-1830-P: Medicare program: End-Stage Renal Disease Prospective Payment System and Quality Incentive Program, proposed rule***

Dear Dr. Oz:

The Association for Professionals in Infection Control and Epidemiology (APIC) wishes to thank the Centers for Medicare and Medicaid Services (CMS) for the opportunity to provide input to the CY 2026 End-Stage Renal Disease (ESRD) Prospective Payment System Update and Quality Incentive Program (QIP) proposed rule. APIC is a nonprofit, multidisciplinary organization representing 15,000 infection preventionists (IPs) whose mission is to create a safer world through the prevention of infection.

***Proposed Removal of the Facility Commitment to Health Equity (FCHE) Measure Beginning with the PY 2027 ESRD QIP***

APIC recognizes the importance of addressing disparities in healthcare to improve the quality of care and reduce healthcare-associated infections (HAIs). According to the recently-released report by APIC's Health Equity Committee and the APIC Center for Research, Practice and Innovation, [The Impact of Health Disparities and Inequities on Healthcare-Associated Infections: a Call to Action](#), "Adopting a health equity lens to address disparities in healthcare-associated infection (HAI) outcomes can enhance the effectiveness and inclusivity of prevention strategies. By identifying and addressing these infections' social and structural drivers, healthcare systems can implement more comprehensive strategies to reduce healthcare-associated infections (HAIs) and improve patient outcomes." The [Deloitte Health Equity Institute](#) estimated the cost of health inequities at \$320 billion annually, including increased healthcare spending and lost productivity,<sup>1</sup> far outweighing CMS's estimated burden of implementing the FCHE measure. While data collection always adds some burden, meaningful and actionable health data is needed to drive quality improvements to eliminate health disparities.

**APIC Recommendation:** APIC opposes removal of the FCHE measure from the ESRD Quality Incentive Program.



***Proposed Removal of Two Social Drivers of Health (SDOH) Reporting Measures Beginning with the PY 2027 ESRD QIP***

Social drivers of health (SDOH), the nonmedical factors that influence health outcomes, have been shown to have a greater influence on health than either genetic factors or access to healthcare services. Addressing SDOH will lead to progress toward health equity.<sup>2</sup> The collection of SDOH data serves as an important first step to improve equity in patient safety.<sup>3</sup> Standardized SDOH data will assist in recognizing areas of need and enhance efforts to improve resident/patient outcomes across healthcare settings. We acknowledge the feedback and considerations regarding the collection of the Health Equity measures; however, we believe that these measures provide valuable insights that are crucial for hospital leadership in driving quality improvements and addressing health disparities. Despite the focus on clinical outcome measures, the structural data collected through these measures offer significant benefits that support our overarching goals in health equity. Therefore, we do not agree with the removal of these measures, as their continued implementation is essential for maintaining a comprehensive approach to improving health outcomes and ensuring equitable care.

**APIC Recommendation:** APIC opposes the removal of the Screening for Social Drivers of Health reporting measure and the Screen Positive Rate for Social Drivers of Health reporting measure from the ESRD QIP.

APIC appreciates the opportunity to provide recommendations relating to infection prevention and control provisions in the proposed rule. We look forward to continuing to work with CMS to prevent healthcare-associated infections in healthcare facilities.

Sincerely,

A handwritten signature in black ink that appears to read "Carol McLay".

Carol McLay, DrPH, MPH, RN, CIC, FAPIC, FSHEA  
2025 APIC President

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<sup>1</sup> Bhatt J, Gerhardt W, et.al. U.S. health care can't afford health inequities, Deloitte Insights, Issue 31, June 22, 2022. Available at <https://www2.deloitte.com/us/en/insights/industry/health-care/economic-cost-of-health-disparities.html>. Accessed 6/10/2025.

<sup>2</sup> U.S. Centers for Disease Control and Prevention: Social Determinants of Health, January 2024. Available at <https://www.cdc.gov/about/priorities/why-is-addressing-sdoh-important.html>.

<sup>3</sup> Thomas A, Lee M, Mossburg S. Equity in Patient Safety. PSNet [internet]. Rockville (MD): Agency for Healthcare Research and Quality, US Department of Health and Human Services. 2024. Available at <https://psnet.ahrq.gov/perspective/equity-patient-safety>.