



June 17, 2022

Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services

RE: CMS-1771-P

Dear Administrator Brooks-LaSure:

The American Lung Association appreciates the opportunity to comment on the climate change portions of the FY23 IPPS Proposed Rule. These comments are focused specifically on the proposal's Assessment of the Impact of Climate Change and Health Equity in Section IX.

The American Lung Association is the nation's oldest voluntary health organization, with a mission of saving lives by improving lung health and preventing lung disease. We strongly support ensuring the healthcare sector both prepares for the impacts of climate change and reduces its emissions. Climate change is a health emergency, and addressing it is core to HHS' mission. While the Lung Association is not a direct provider of healthcare services, the patient population we serve – people with lung disease – is disproportionately affected by the health impacts of climate change.

We appreciate your consideration of the implications of climate-related extreme weather events for patient care. People with lung disease can be at greater risk of health harm from extreme heat. Extreme storms that require evacuation can put patients with chronic disease, such as lung disease, at greater risk if they are separated from their normal medical care. Patients who use supplemental oxygen also face additional hurdles in evacuating. Climate-related extreme weather events can also cause flooding, which can lead to the growth of mold, endangering people with lung disease (as well as the general population) when they return to their homes, businesses and healthcare facilities after the floodwaters recede.

Additional climate-related health threats include increased air pollution, both because higher temperatures make ground-level ozone more likely to form, and because they enhance the conditions for wildfires, leading to more intense and longer-lasting episodes of dangerous wildfire smoke. Climate change also drives longer and more intense allergy seasons. These impacts can harm anyone's health, but people with lung disease are again at greater risk of harm, as are infants, children, pregnant people, seniors, and people who work outdoors. These impacts also disproportionately harm communities of color, as well as low-income communities.

We urge CMS to provide resources to providers and healthcare systems that ensure patients understand their risks from these impacts and how to mitigate them. Healthcare providers are uniquely positioned to ensure that patients understand the implications of climate change on health. The general public increasingly connects climate change with health threats, but more must be done to ensure these connections are top-of-mind. Physicians, nurses and other health professionals are trusted voices who have a strong opportunity to influence patients' actions, and thereby help protect their health from the threats posed by climate change.

Patients would benefit from healthcare providers and facilities sharing resources on how to track and mitigate the specific impacts of climate change, such as knowing how to look up daily air quality at www.airnow.gov and what precautions to take on air quality alert days or extreme heat days. In the case of wildfire, for example, patients can take actions such as staying indoors, recirculating air conditioning if they have it, using a mechanical air filtration device appropriate for their room size (or creating one using low-cost materials), wearing an N-95 mask if possible, and preparing for an evacuation if necessary. (More information is available at Lung.org/wildfire.) Cleanup after damage from a wildfire poses additional challenges to patients. Healthcare providers are well-positioned to provide guidance to patients on protecting their health from wildfires and other climate impacts before, during and after these events.

Key resources on the current status of health impacts of climate change in the U.S. include the [Lancet medical journal's 2021 Countdown report](#) and [U.S. Brief](#), as well as the mapping tools provided by the [Centers for Disease Control and Prevention's Environmental Public Health Tracking Program](#). Additionally, CDC's Climate and Health Program provides grant funds for city, state and Tribal programs to assess and prepare for local impacts in ways that can inform best practices in locations nationwide. Projects have included mapping neighborhoods most vulnerable to extreme heat to provide targeted resources on the availability of cooling centers; educating healthcare providers on the identification of Lyme Disease as ticks spread to new locations; and putting in place new extreme weather emergency communication protocols. Climate impacts are highly variable by location, so it is important to ensure healthcare systems and providers have resources to identify the health impacts most relevant to the populations they serve.

We appreciate the considerations of climate change in this proposed rule, and urge you to equip the healthcare sector with information on avoiding and addressing health impacts that healthcare professionals can use to plan their own operations and pass along to patients.

Sincerely,

Harold Wimmer
National President and CEO
American Lung Association