



June 10, 2023

Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare and  
Medicaid Services

Elizabeth Fowler, Ph.D., J.D.  
Deputy Administrator and  
Director  
Center for Medicare and  
Medicaid Innovation

Dora Hughes, M.D., M.P.H.  
Acting Chief Medical Officer  
and Acting Director  
Center for Clinical Standards  
and Quality

**Re: Proposed rule CMS-1808-P – The Centers for Medicare & Medicaid Services proposed voluntary TEAM Decarbonization and Resilience Initiative, as included within the revised Medicare hospital inpatient prospective payment systems (IPPS).**

Dear Administrator Brooks-LaSure, Deputy Administrator Fowler and Acting Director Hughes:

As members of the [U.S. Health Care Climate Council](#), we support the *TEAM Decarbonization and Resilience Initiative* ([§ 512.598](#)) and applaud the Center for Medicare and Medicaid Innovation (CMMI) for taking this thoughtful and decisive step to move the health care sector toward improved efficiency and climate action. The TEAM Decarbonization and Resilience Initiative will create new opportunities for participating hospitals to track and reduce their carbon emissions and build climate resilience. Ultimately, this Initiative will improve patient outcomes, contribute to a healthier environment, and reduce health care costs.

Given the fiscal, operational, and clinical realities that the health sector faces, we understand and support this program as a means of creating health care cost savings through improved efficiency measures as related to reducing greenhouse gas emission. Like all other health care organizations in this current economic environment, our own health systems are navigating fiscal challenges as we implement our climate action plans and advance efforts in environmental sustainability. With the U.S. health care sector responsible for approximately [8.5% of the nation's emissions](#), we must recognize our obligation and the urgent need to decarbonize our health care operations and protect the public's health. All of us have committed to reducing our emissions by 50% by 2030 and becoming net zero by 2050.

Climate change is a health equity issue that disproportionately impacts the most vulnerable and exacerbates unjust health disparities. Centering health care strategies on populations that make up the highest readmission rates is key to addressing the current financial challenges health care faces.



Furthermore, climate action can also improve community health by improving local air quality, and the investments involved can boost local economies.

Advancing environmental sustainability through the TEAM Decarbonization and Resilience Initiative creates opportunities for more health systems to address the intersecting challenges of health care, health equity and climate. Decreasing climate pollution to prevent climate disasters is a significant opportunity for health systems to address the very factors that are challenging their financial viability, operational efficiency, workforce shortages, and morale. For instance, increasing [efficiency and transitioning to clean energy can save health systems money](#), decreasing health care costs. Pursuing climate-related initiatives has also been shown to aid in [recruiting and retaining care staff](#) while also improving the quality of care.

We commend CMS for exploring ways to recognize the hospitals that participate in this Initiative such that patients have this information when researching their health care options. To increase voluntary participation in the TEAM Decarbonization and Resilience Initiative, and allow more health systems to unlock the above-stated health and cost benefits of environmental sustainability, we urge you to consider the addition of financial incentives for participating hospitals alongside the technical assistance offered by CMS as part of the Initiative.

We appreciate your commitment to addressing climate as a health care efficiency issue and strategic imperative and look forward to continuing to support your efforts to help move the sector forward in addressing climate change. If you have questions regarding our comments, please contact Antonia Herzog at [aherzog@hcwh.org](mailto:aherzog@hcwh.org).

Sincerely,

The U.S. Health Care Climate Council

The [U.S. Health Care Climate Council](#) is a leadership body of 19 health systems committed to protecting our patients and employees from the health impacts of climate change and becoming anchors for resilient communities. Health Care Climate Council members implement innovative climate solutions, inspire and support others to act, and use our trusted voice and purchasing power to drive the transformation to climate-smart health care. The Health Care Climate Council collectively represents over 550 hospitals and 9500 health centers across 45 states, with more than 1.2 employees serving over 77 million patients annually.