























June 10, 2024

The Honorable Chiquita Brooks-LaSure Administrator Centers for Medicare & Medicaid Services Department of Health and Human Services 7500 Security Blvd Baltimore, MD 21244

RE: Medicare and Medicaid Programs and the Children's Health Insurance Program: Hospital Inpatient Prospective Payment Systems for Acute Care Hospitals and the Long Term Care Hospital Prospective Payment System, etc.

Attention: CMS-1808-P

Dear Administrator Brooks-LaSure:

The undersigned public health, medical and nursing organizations support the proposed plan for the Transforming Episode Accountability Model (TEAM) Decarbonization and Resilience Initiative. Our organizations have a long history of urging action on climate change in order to protect human health. We are pleased that the Department of Health and Human Services has taken steps to incorporate climate change into its work across the department and support the proposed plan for further action within the Centers for Medicare and Medicaid Services.

Climate change is a health emergency. According to the National Oceanic and Atmospheric Administration, an unprecedented 28 billion-dollar disasters struck the U.S. in 2023. The Fifth National Climate Assessment underscored that climate change threatens the health of every person in this country, and painted a grim picture for public health and the ability of health systems to respond to climate change absent drastic emissions reductions. Millions of people across the U.S. are subject to increasingly frequent and severe weather events such as excessive heat, intense rainfall, drought and wildfires.

These events cause more than just one-time disruptions. Disasters like floods and wildfires not only drive increased illness, they also impact access to healthcare and essential services, which could result in longer-lasting impacts on a patient's care. The loss of life, property and community are unfortunately not unusual impacts of these events, and climate-fueled disasters have long-term consequences for health. From the development of mold post-flood to long-term

Health organizations will continue to advocate for bold solutions to the climate crisis. The inclusion of climate mitigation in the HHS Strategic Plan FY 2022-2026 underscores the urgency of treating the climate crisis as a health emergency. We support the proposed voluntary TEAM Decarbonization and Resilience Initiative. We urge its finalization and look forward to it becoming a starting point for future action that engages the whole of the healthcare sector to dramatically reduce emissions.

## Signed,

Allergy & Asthma Network
Alliance of Nurses for Healthy Environments
American College of Physicians
American Lung Association
Asthma and Allergy Foundation of America
Health Care Without Harm
Medical Society Consortium on Climate and Health
Medical Students for a Sustainable Future (MS4SF)
National Association of Pediatric Nurse Practitioners
National Medical Association
Oncology Advocates United for Climate and Health (OUCH)
Physicians for Social Responsibility

<sup>1</sup> NOAA National Centers for Environmental Information (NCEI) U.S. Billion-Dollar Weather and Climate Disasters

(2024). https://www.ncei.noaa.gov/access/billions/, DOI: 10.25921/stkw-7w73

<sup>&</sup>lt;sup>2</sup> USGCRP, 2023: Fifth National Climate Assessment. Crimmins, A.R., C.W. Avery, D.R. Easterling, K.E. Kunkel. B.C.

Stewart, and T.K. Maycock, Eds. U.S. Global Change Research Program, Washington, DC, USA. https://doi.org/10.7930/NCA5.2023

NOAA National Centers for Environmental Information, Monthly Global Climate Report for Annual 2023, published online January 2024, retrieved on March 13, 2024 from https://www.ncei.noaa.gov/access/monitoring/monthly-report/global/202313

<sup>&</sup>lt;sup>4</sup> American Lung Association. State of the Air 2024. Key Findings: Ozone Trends (April 2024) lung.org/sota

<sup>&</sup>lt;sup>5</sup> Walinski A, Sander J, Gerlinger G, Clemens V, Meyer-Lindenberg A, Heinz A. The Effects of Climate Change on Mental Health. Dtsch Arztebl Int. 2023 Feb 24;120(8):117-124. doi: 10.3238/arztebl.m2022.0403. PMID: 36647584; PMCID: PMC10154789.

<sup>&</sup>lt;sup>6</sup> Eckelman MJ, Sherman J (2016) Environmental Impacts of the U.S. Health Care System and Effects on Public Health. PLoS ONE 11(6): e0157014. https://doi.org/10.1371/journal.pone.0157014