



Tribal Technical Advisory Group



To the Centers for Medicare & Medicaid Services

c/o National Indian Health Board | 50 F Street NW | Washington, DC 20001 | (202) 507-4070 | (202) 507-4071 fax

June 10, 2025

The Honorable Mehmet Oz
Administrator
Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

Submitted via regulations.gov

Re: Medicare Program: Prospective Payment System and Consolidated Billing for Skilled Nursing Facilities; Updates to the Quality Reporting Program for Fiscal Year 2026 – Request for Information (RFI) Potential Revision of the Final Data Submission Deadline from 4.5 months to 45 Days

Dear Administrator Oz:

On behalf of the CMS Tribal Technical Advisory Group (TTAG), I write to respond to the Centers for Medicare and Medicaid Services (CMS) Request for Information (RFI) on the Medicare Program; Prospective Payment System (PPS) and Consolidated Billing for Skilled Nursing Facilities (SNF) – Potential Revision of the Final Data Submission Deadline from 4.5 months to 45 Days. The TTAG leadership requests an exemption for rural SNF facilities, which may face significant challenges in meeting this dramatically reduced deadline.

While many Tribal SNFs currently submit final data within 45 after the quarterly period, special exemptions and considerations are necessary for facilities in rural and remote areas. This proposed change would pose serious administrative burdens due to ongoing staffing shortages in Tribal communities. In addition to workforce capacity concerns, many Tribal SNFs lack the electronic infrastructure needed to meet the 45-day submission deadline. Though we support the advancement of digital quality measurements, Tribal communities remain significantly under-resourced and require investments to upgrade their current Information Technology (IT) systems. Tribal SNFs in rural and remote areas should not be penalized for circumstances out of their control to meet this proposed data submission.

CONCLUSION

For many Tribal communities these SNFs are the only available resources within hundreds of miles and serve as trusted, culturally appropriate providers of care. Any

CMS TTAG Letter to CMS Administrator Mehmet Oz

Re: CMS-1827-P

May X, 2025

Page 2 of 2

added burden on these facilities will directly impact service care delivery to individual Tribal citizens, and we cannot risk a reduction in services in these critical areas.

Our TTAG Tribal leadership appreciates your consideration of the above comments and recommendations, and we look forward to further engagement with CMS.

Sincerely,

A handwritten signature in black ink that reads "W. Ron Allen". The signature is fluid and cursive, with the first name "W." and last name "Allen" clearly legible.

W. Ron Allen, CMS TTAG Chair
Jamestown S'Klallam Tribe, Chairman/CEO