

CMS Listening Session on Rural Health and Tribal Medicare Health Equity Services

On August 23, 2024, CMS Leadership held a virtual discussion with various stakeholders focusing on Medicare Health Equity Services, particularly in the context of rural and tribal health services. The conversation included providers, patients, program managers, local service representatives, and other key stakeholders. CMS Leadership posed questions about Social Determinants of Health (SDoH) Risk Assessment, PIN and CHI Codes, and Community-Based Organizations (CBOs) to gain insights and improve services.

Social Determinants of Health (SDoH) Risk Assessment

Stakeholders highlighted that many practices are not routinely screening for Social Determinants of Health (SDoH), nor are they billing for related services. This lack of screening is primarily due to the absence of integration within existing Electronic Health Records (EHRs). Without prompts or integration, SDoH assessments often get overlooked, leading to inconsistent application across different healthcare systems. Additionally, practitioners are sometimes hesitant to collect SDoH data due to concerns about being unable to provide adequate support for identified needs, creating a situation where these important assessments are neglected.

Coding and Interoperability

There was a clear concern among participants regarding the lack of awareness and utilization of specific billing codes related to SDoH and other health equity services. Many providers are unaware of these codes or are unsure about the correct coding and billing processes. This is compounded by a lack of standardized training, especially for roles like Community Health Workers (CHWs), whose integration into the healthcare system remains inconsistent. The variability in training and the absence of a clear payment structure for CHWs further complicates their inclusion in coding and billing practices, highlighting the need for improved education and technical assistance for providers.

Relationships with CBOs

The discussion also addressed the relationship between healthcare providers and Community-Based Organizations (CBOs). Providers expressed a need for clearer guidelines from CMS on contracting with CBOs, particularly regarding supervision requirements for billing. There is also a concern about the slow integration of CBOs into the billing framework, which hampers effective collaboration. Despite existing partnerships, there are challenges related to the capacity and sustainability of CBOs in supporting the required services, indicating the need for more robust support structures and financial incentives.



Barriers to Utilization

Several barriers to the utilization of health equity services were identified. These include the lack of reminders or integration within EHRs, inadequate support for addressing identified social needs, and the absence of official designations and certifications for auxiliary personnel like CHWs. Additionally, the lack of a clear payment structure for auxiliary personnel and legislative support further discourages the adoption of these services. Providers are also concerned about stepping outside their traditional roles to address SDoH, adding to the reluctance to engage with these assessments.

Potential Solutions

To overcome these barriers, several potential solutions were discussed. There is a strong need for better technical integration of SDoH assessments into EHR systems, along with comprehensive training and educational materials to increase provider awareness of the relevant codes. Legislative support is also crucial in establishing official certifications and payment structures for CHWs and similar personnel. Moreover, incentivizing billing and reimbursement processes could encourage more effective integration of CBOs into healthcare practices, ultimately leading to more sustainable partnerships and improved patient outcomes.

These insights will be instrumental in helping CMS and HHS refine strategies and develop resources to better support healthcare providers in rural, Tribal, and geographically isolated areas

If you have any additional thoughts or questions, please reach out to RuralHealth@cms.hhs.gov. For more information about the new Medicare health equity services and CPT codes, please refer to the [CMS document](#). We also encourage you to explore the "Reframing Health Disparities in Rural America: A Communications Toolkit" that was discussed during this meeting.