



November 16, 2018

Re: Response to IMPACT ACT Research Study: Provider and health plan approaches to improve care for Medicare beneficiaries with social risk factor

Parkland Health & Hospital System (Parkland) appreciates the opportunity to submit comments in response to the request for information related to the IMPACT Act's study on social risk factors by the Office of the Assistant Secretary for Planning and Evaluation (ASPE).

Located in Dallas County, Texas, Parkland is one of the busiest safety-net health systems in the country. Our mission is to care for the indigent and uninsured residing in our hospital district. In addition, Parkland is home to premier services such as a level I trauma center, the largest level III neonatal intensive care unit in North Texas and one of the largest civilian burn centers in the nation. Parkland is the primary teaching hospital for the University of Texas Southwestern Medical Center training an estimated 40 percent of physicians within the greater Dallas area.

We provided more than \$879 million in uncompensated care in fiscal year 2017 and saw over 1 million outpatient visits throughout our network of 20 primary care and women's health clinics, 12 school-based clinics and numerous other outreach activities throughout Dallas County. Our payor mix is about 75 percent uninsured or on Medicaid and 16 percent Medicare.

The following pages reflect comments from two perspectives: our health system and the Parkland Center for Clinical Innovation (PCCI) which is an affiliate to our health system. In addition to the submitting answers to the RFI, we are incorporating a document PCCI developed in conjunction with CMS's Center for Medicare and Medicaid Innovation (CMMI) Cross Model Learning Network.

Thank you for your consideration of these comments.

Sincerely

Katherine Yoder
Vice President of Government Relations