



1400 Crystal Drive, Suite 900  
Arlington, VA 22202  
Phone: 202/789-1890  
Fax: 202/789-1899  
[apicinfo@apic.org](mailto:apicinfo@apic.org)  
[apic.org](http://apic.org)

May 29, 2026

Dr. Mehmet Oz  
Administrator  
Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services  
7500 Security Blvd.  
Baltimore, MD 21244-1850

***Re: Docket #CMS-1845-P: Medicare Program: Inpatient Rehabilitation Facility Prospective Payment System for FY 2027 and Updates to the IRF Quality Reporting Program, proposed rule***

Dear Dr. Oz:

The Association for Professionals in Infection Control and Epidemiology (APIC) wishes to thank the Centers for Medicare and Medicaid Services (CMS) for the opportunity to provide input to the FY 2027 Inpatient Rehabilitation Facility Prospective Payment System (IRF PPS). APIC is a nonprofit, multidisciplinary organization representing 15,000 infection preventionists (IPs) whose mission is to create a safer world through the prevention of infection.

**Proposed Revision of the Final Data Submission Deadline Period from 4.5 Months to 45 Days**

Timely reporting of quality and other performance measures allows healthcare consumers to make educated decisions about where to receive care. Moving from a 4.5-month reporting period to a 45 day after the quarter ends reporting period will reduce the time from reporting to public display. Based on the analysis performed by CMS, 97.5 percent of facilities reporting submitted the data within 45 days, so the shortened reporting period does not seem to create a burden.

APIC Recommendation: APIC supports shortening the data submission deadline for the IRF QRP to 45 days after the quarter ends, beginning with the FY 2029 program year.

APIC appreciates the opportunity to provide recommendations relating to infection prevention and control provisions in the proposed rule. We look forward to continuing to work with CMS to prevent healthcare-associated infections in healthcare facilities.

Sincerely,

A handwritten signature in black ink that reads "Kathy Ward".

Kathy Ward, RN, BSN, MPH, FAPIC, CIC  
2026 APIC President