



July 27, 2026

Centers for Medicare & Medicaid Services
Office of Rural Health Transformation
Attention: PRA Reports Clearance Officer
7500 Security Boulevard Baltimore, MD 21244

RE: CMS-10949; ICR Reference Number 202607-0938-002; Medicaid Rural Health Transformation (RHT) Program Reporting

Submitted electronically via regulations.gov.

To Whom It May Concern,

The National Rural Health Association (NRHA) is pleased to offer comments on the Centers for Medicare and Medicaid Services' (CMS) information collection request for the Rural Health Transformation (RHT) Program (CMS-10949). NRHA appreciates CMS' continued commitment to the needs of the more than 60 million Americans that reside in rural areas, and we look forward to our continued collaboration to improve health care access throughout rural America. We support CMS's efforts to modernize rural health, improve transparency, and ensure accountability for the historic federal investment authorized under Public Law 119-21. As such, NRHA requests CMS make the RHT Program reporting data collected under this information collection request (IRC) publicly available.

NRHA is a non-profit membership organization with more than 21,000 members nationwide that provides leadership on rural health issues. Our membership includes nearly every component of rural America's health care, including rural community hospitals, critical access hospitals, doctors, nurses, and patients. We work to improve rural America's health needs through government advocacy, communications, education, and research.

The RHT Program represents one of the largest rural health investments in U.S. history. The reporting requirements outlined in the IRC package (including initiative progress, checkpoint completion, State Policy Action commitments, obligated and spent funds, and sustainability planning) create a rich dataset that is essential for public oversight of federal spending and transparency into State-level policy actions and commitments. NRHA applauds CMS's efforts to use this data to provide an understanding of how rural communities are being served and ensure equitable distribution of funds across rural populations. However, the PRA materials do not indicate whether CMS intends to publish these data. Given the scale of the program and the importance of rural health transformation, public access should be a core design feature.

Rural communities deserve visibility into how federal funds are being used to support their health systems. The documents included in the IRC package are designed in a manner that supports public transparency through public dashboards, downloadable datasets, or annual public reports. A commitment by CMS for public access to data would allow rural residents to understand how their State is progressing, encourage cross-State learning and innovation, and strengthen trust in federal

RuralHealth.US

50 F. St., N.W., Suite 520

Washington, DC 20001 | 202-639-0550



rural health initiatives. Further, public release of data would enable researchers to evaluate program effectiveness and support stakeholders and policymakers in identifying best practices.

CMS already publishes extensive data on Medicare, Medicaid, and Innovation Demonstrations. The RHT Program should follow the same precedent. CMS has proposed a solid infrastructure to support transparency and should equally commit to making the data publicly available. NRHA respectfully requests that CMS commit to public release of RHT Program data annually including initiative checkpoint completion status, obligated and spent funds by entity and initiative, and sustainability planning summaries. Further, we encourage the creation of a public-facing dashboard or dataset in a way that can be exported and shared.

The RHT Program is a landmark federal investment in rural health. The rural health community deserves visibility into how these funds are being used, how States are progressing, and what outcomes are being achieved. We appreciate CMS's leadership and welcome continued collaboration to ensure the RHT Program delivers meaningful, measurable improvements for rural communities nationwide. For additional information, please contact NRHA's Chief Policy Officer, Carrie Cochran-McClain, at ccochran@ruralhealth.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Morgan", is positioned above the typed name.

Alan Morgan
Chief Executive Officer
National Rural Health Association