



Advancing Health in America

Washington, D.C. Office
800 10th Street, N.W.
Two CityCenter, Suite 400
Washington, DC 20001-4956
(202) 638-1100

August 19, 2020

The Honorable Russell Vought
Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

***RE: Physician Self-Referral and Anti-Kickback Statute final regulations (RIN: 0938-AT64;
RIN: 0936-AA10)***

Dear Director Vought:

On behalf of our nearly 5,000 member hospitals, health systems and other health care organizations, our clinical partners – including more than 270,000 affiliated physicians, 2 million nurses and other care givers – and the 43,000 health care leaders who belong to our professional membership groups, the American Hospital Association (AHA) urges an expeditious review and release of the Physician Self-Referral and Anti-Kickback Statute final regulations that were submitted by the Centers for Medicare & Medicaid Services (CMS) and the Health & Human Services Office of Inspector General in July.

We greatly appreciate the Administration's sustained commitment to reduce regulatory burden. These rules take on even more significance in light of the COVID-19 pandemic. Throughout this crisis, the focus of hospitals and health systems during the pandemic has been ensuring safe care for patients, protecting health care professionals providing care, and supporting the health and safety of communities. These rules will remove unnecessary regulatory burden from hospitals and health systems, allow for enhanced care coordination for patients, improve quality, and reduce waste in the Medicare and Medicaid programs.

The AHA has welcomed, supported and actively participated in this Administration's efforts to remove unnecessary regulatory burdens while "putting patients over paperwork," including CMS's waivers from the Stark Law during the pandemic. Overall, these rules are the culmination of years' worth of study and engagement with stakeholders by the Administration to achieve those goals. The AHA appreciates the Administration's willingness to tackle these longstanding barriers, and we stand ready to assist in implementing the final rules.

Sincerely,

/s/

Thomas P. Nickels
Executive Vice President

