

January 27, 2021

Elizabeth Richter
Acting Administrator
Center for Medicare & Medicaid Services
Hubert H. Humphrey Building
200 Independence Avenue, S.W., Room 445-G
Washington, DC 20201

Dear Ms. Richter:

On behalf of our nearly 5,000 member hospitals, health systems and other health care organizations, our clinician partners – including more than 270,000 affiliated physicians, 2 million nurses and other caregivers – and the 43,000 health care leaders who belong to our professional membership groups, the American Hospital Association (AHA) requests that you extend the deadline for hospitals to submit 2020 data for the Medicare Promoting Interoperability Program from March 1 to at least May 1, 2021.

Since the beginning of the year, hospitals have encountered and reported a number of issues preventing them from being able to complete the attestation process for the 2020 program year. These issues include being unable to submit a completed attestation form, the system only accepting data for one of the four quarters of the year rather than accepting data from “any 90-day period” within the calendar year as the regulation allows, and lack of system recognition of concurrent electronic clinical quality measures (eCQM) submission by vendors. The situation has been compounded by hospitals, occasionally, receiving inaccurate information from the QualityNet Help Desk.

With the current attestation deadline only one month away, it is our understanding that the Centers for Medicare & Medicaid Services (CMS) is still working with the system developers. While we appreciate that this work is underway, we encourage CMS to provide clear and ongoing communication directly to the field regarding any outstanding issues and the timeline for their resolution. Many of the individuals who manage hospitals’ attestation for the Promoting Interoperability Program also play significant roles in their organization’s vaccine rollout, hospital COVID-19 data reporting and other operations for COVID-19 response. At a time when hospital staff are stretched to their limits, this data reporting should not be adding burden by requiring hospital staff to



devote time to re-entering data and engaging in prolonged back and forth communication with the Help Desk.

In the current environment, giving hospitals that have successfully met program requirements adequate time to submit attestations is critical. We appreciate CMS' willingness to provide extensions as needed for attestation periods in previous years and believe the issues encountered this year, compounded by the ongoing public health emergency, warrant an extension as well. We urge CMS to act on this extension quickly and to provide notice to the field as soon as possible.

Please contact me if you have questions or feel free to have a member of your team contact Samantha Burch, director of health information technology policy, at sburch@aha.org or 202-626-2313.

Sincerely,

/s/

Ashley B. Thompson
Senior Vice President
Public Policy Analysis and Development