



January 11, 2022

The Honorable Xavier Becerra
Secretary
Department of Health and Human Services
200 Independence Avenue S.W.
Washington, D.C. 20201

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Dear Secretary Becerra and Administrator Brooks-LaSure:

I am writing to you on behalf of the approximately 5,000 Rural Health Clinics (RHCs) and the thousands of communities they care for regarding the recently finalized Good Faith Estimate (GFE) rules. As RHCs have processed the implications of this policy, we have heard overwhelming feedback that the rules are confusing and burdensome.

While the National Association of Rural Health Clinics (NARHC) is very supportive of efforts to increase price transparency for patients, we request that CMS waive or rescind these policies until after the Public Health Emergency.

There are two main concerns. First, requiring administrative staff to identify and adjudicate which patients should be offered GFEs adds additional steps and time to the scheduling of each and every visit. Second, our RHCs are finding that providing diagnosis codes and identifying the reasonably expected treatment, based on the patient's conversation with a non-clinical scheduler is extremely difficult to properly implement. Given the stress that Omicron is putting on our outpatient offices, it is not the right time to enforce these well-intentioned but complicated rules.

As the GFE policy evolves, we hope to engage with CMS on ways to achieve the price-transparency goals of the policy without adding so much complexity and cost to the scheduling process.

Sincerely,

Nathan Baugh

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