

September 3, 2020

Mark Meadows
Assistant to the President and Chief of Staff
1600 Pennsylvania Ave NW
Washington, DC 20500

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

The Honorable Alex Azar
Secretary, Health and Human Services
200 Independence Ave SW
Washington, DC 20201

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

Dear Mr. Meadows, Secretary Azar, and Director Vought:

We, the undersigned organizations, urge the Administration to expedite the issue of final rules to modernize changes to the Physician Self-referral law (Stark law) and the Anti-Kickback Statute (AKS). We applaud the Administration's recognition that the current laws present significant barriers to coordinated and value-based care, and we strongly urge the agencies to finalize the modernized regulations as soon as possible.

Our group consists of Leading Health Systems—integrated delivery networks that pursue innovative care efforts throughout our communities—serving more than 32 million patients annually in 26 states across the country. In light of the coronavirus pandemic, Leading Health Systems are implementing new methods of care delivery and providing support for our communities in novel ways: setting up triage tents on hospital grounds, providing contact-tracing support to local public health departments, redistributing frontline providers and necessary supplies between our integrated network facilities, and investing in innovative technologies to care for patients remotely. The coronavirus pandemic has highlighted why, now more than ever, the regulatory barriers and burdens associated with the Stark law and AKS must be modernized immediately to ensure care coordination and to promote the safest methods of care delivery.

Again, we commend the Administration's commitment to modernizing the Stark Law and AKS and urge an expedited release of the final rules. Leading Health Systems have been invested in modernizing these regulations for several years, are committed to supporting the swift implementation of these regulations. Please consider our organizations as a resource and willing partner.

Sincerely,

AdventHealth
Adventist Health
Advocate Aurora Health
ChristianaCare
Inova Health

Intermountain Healthcare
Novant Health
Ochsner Health
Sutter Health
UnityPoint Health