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January 4, 2021

Ms. Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
200 Independence Ave., S.W.  
Washington, D.C. 20201

**Re: Reducing Provider and Patient Burden by Improving Prior Authorization Processes, and Promoting Patients' Electronic Access to Health Information (CMS-9123-P)**

Dear Administrator Verma:

The American Association for Homecare (AAHomecare) is pleased to submit comments on the Centers for Medicare and Medicaid Services' (CMS') above captioned Proposed Rule (CMS-9123-P). AAHomecare is the national association representing DMEPOS suppliers, manufacturers, and other stakeholders in the homecare community. Our members are proud to be part of the continuum of care that assures Medicare beneficiaries receive cost effective, safe, and reliable home care products and services.

In this proposed rule, CMS is proposing policies to improve interoperability and communication between payers, providers, and beneficiaries. The rule includes proposals to require payers to communicate pending and active prior authorization (PA) decisions, set PA decision timelines, notices to beneficiaries on denials and changes in benefit, and payers to publicize PA metrics.

AAHomecare is in support of changes to enhance interoperability to promote patient service and access to needed care. More specifically, we support the communication enhancements for PA between payers, providers, and beneficiaries. AAHomecare recommends the communication enhancements proposed in this rule to be applied to DMEPOS PA for both Medicaid and Medicare, including Medicare Advantage plans. We believe these types of changes will be incredibly helpful in improving transparency and education for all services included in PA programs. The Association has been involved in CMS' work on developing the Documentation Requirement Lookup Service (DRLS) to help streamline the documentation and PA requirements for DMEPOS orders. If properly implemented, we believe DRLS and other FHIR-based applications will improve healthcare delivery.

Thank you for the opportunity to comment. Please contact me at [kimb@aahomecare.org](mailto:kimb@aahomecare.org) if you have any questions.

Sincerely,

Kimberley S. Brummett  
VP, Regulatory Affairs