

August 31, 2015

Andy Slavitt, Acting Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244-1850

Submitted electronically via: <http://www.regulations.gov>

RE: Hospital Outpatient Prospective Payment and Ambulatory Surgical Center Payment Systems and Quality Reporting Programs; Short Inpatient Hospital Stays; Transition for Certain Medicare-Dependent, Small Rural Hospitals under the Hospital Inpatient Prospective Payment System (CMS-1633-P)

Dear Administrator Slavitt:

Attached, please find a recent letter submitted to Secretary Burwell that underscores our concerns around the “Two Midnights” rule as addressed in the calendar year (CY) 2016 Hospital Outpatient Prospective Payment System (OPPS) proposed rule.

As indicated in the letter, we respectfully ask that CMS: finalize the proposed changes to the “Two Midnights” rule and use its authority to eliminate remaining time-based criterion for hospital admissions exceeding the two-midnight threshold. We feel that these changes will adequately allow each beneficiary to be evaluated by a qualified provider’s judgment and not by an arbitrary time-based admission standard.

We appreciate your consideration of this important request.

Sincerely,

American Association of Nurse Practitioners
American Nurses Association
International Council on Active Aging
National Association of Hispanic Nurses
National Hispanic Medical Association
National Minority Quality Forum
National Patient Advocate Foundation
National Rural Health Association
Palm Beach County Partnership for Aging
Population Health Alliance
The Latino Coalition
Treasure Coast Advocates for Seniors