Illinois Health and Hospital Association

The Hon. Lauren Underwood
1410 Longworth House Office Building
Washington, DC 20515

Dear Congresswoman Underwood:

On behalf of our more than 200 member hospitals and nearly 40 health systems, the Illinois Health and Hospital Association (IHA) writes regarding H.R. 5378, the *Lower Costs, More Transparency Act*.

We are grateful for the federal support provided to date, and your work to provide essential care to Illinois patients and communities. However, IHA has serious concerns about this legislation which advances site-neutral payment cuts and places additional regulatory burden on hospitals and health systems. These proposals would further exacerbate the hospital community's ongoing financial challenges, endangering patient
access to critical healthcare services and disproportionately impacting vulnerable patient populations.

IHA strongly opposes Section 203 of the *Lower Costs, More Transparency Act*, which would implement harmful site-neutral payment cuts for drug services administered in off-campus, provider-based departments. Hospital outpatient departments (HOPDs) provide essential drug administration services, including treatments for sicker, more medically complex patients than those treated in stand-alone physician offices or ambulatory surgical centers. HOPDs treat more medically vulnerable patients and are required to comply with more stringent regulatory, licensure, accreditation and safety requirements than other sites of care. The current payment rates support this higher standard of care, which ensures drugs are safely prepared and administered.

Additionally, hospitals provide critical services to their communities, which require additional investment and resources. Unlike other outpatient settings, hospitals provide 24/7 emergency care and maintain standby capacity for unexpected emergencies, disasters and traumatic events. Finally, it is estimated that these cuts
would cost Illinois hospitals $145 million over ten years.

IHA is also concerned that Section 101, codifying the Hospital Price Transparency Rule that took effect in 2021, would no longer recognize price estimator tools as a method to meet the shoppable services requirement. This will disproportionately and unfairly impact hospitals utilizing this tool to comply with the regulation and provide patients with clarity about hospital pricing and their potential out-of-pocket costs. The section also creates additional compliance burden for hospitals, requiring them to align existing posted information in a new format determined by the Centers for Medicare & Medicaid Services.

Thank you for your consideration of our concerns. We look forward to working with you to ensure patients continue to have access to quality care in their communities.

Sincerely,

Jennifer Koehler
VP Government Relations
Illinois Health & Hospital Association

Your trusted voice and resource

COMPdata Informatics

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