



Sept 16, 2019

Submitted by email to: clint.farr@alaska.gov

Dear Mr. Farr,

The Alaska State Hospital and Nursing Home Association (ASHNHA) is submitting comments on the Department of Health and Social Services regulations on 7 AAC 86. Health Care Services Price Transparency.

Overall ASHNHA supports the proposed changes to regulations to address new price transparency requirements. We believe DHSS has done the best job possible to integrate the requirements into the DHSS operations given the lack of funding available to support implementation.

ASHNHA has been supportive of the legislative efforts to make health care prices more transparent to consumers. However, it is important to recognize the current structure of the health care payment and delivery system makes price transparency difficult to implement even when all parties agree on its desirability. Given the challenges inherent in this process we support the proposed regulatory changes and offer just a few comments.

1. We support linking the requirement to report the price of health care services to providers or facilities who use CPT codes. This seems like a reasonable way to decide who is required to comply. There is a lingering concern related to CPT codes. CPT codes are proprietary with American Medical Association. DHSS stated during the public hearing that posting and rewriting CPT codes in plain English has been determined by DHSS legal staff to be fair use of CPT codes. Providers would like an attorney general opinion in writing documenting the determination that using CPT codes as outlined in the regulations is fair use of the proprietary codes.
2. 7ACC 86.010 requires provider or facility to submit the email address of their website of health care services price posting. We assume you intend providers to submit the website URL not an email address.
3. The regulations do not include the specific information that must be posted and instead reference compliance with Alaska Statute AS18.23.400. It is certainly possible for providers to go look up the information in the statute but for clarity and to aid in compliance it would make sense to include the specific information that

must be reported as part of the regulations.

4. Hospitals have established systems to provide good faith estimates to consumers upon request. The requirements in the regulation are in alignment with existing practices by hospitals.

We appreciate the efforts of DHSS to create regulations that balance compliance with health care price transparency law while minimizing reporting effort from health care providers and facilities. We look forward to working together to ensure Alaskans have access to useful information to make health care price comparisons whenever appropriate.

Sincerely,

A handwritten signature in blue ink that reads "Jeannie Monk".

Jeannie Monk
Senior Vice President