



AMERICA'S ESSENTIAL HOSPITALS

April 22, 2020

Alex Azar
Secretary
U.S. Department of Health and Human Services
200 Independence Ave. SW
Washington, DC 20201

Dear Secretary Azar:

America's Essential Hospitals appreciates that the Department of Health and Human Services (HHS) intends to target a portion of COVID-19 relief funds to providers particularly affected by the increased burden of responding to the pandemic. To inform the targeted distribution, the agency has asked hospitals to submit certain data through a portal by April 23. However, our member hospitals report serious technical barriers to accessing this portal to register and submit the requested information. **To ensure hospitals can provide accurate and complete information, we urge HHS to extend the data submission deadline until the department has resolved all technical issues and clearly and publicly communicated the intended use of this data.**

As we understand it, instructions for accessing the portal were sent to hospitals via email on or after April 12. Subsequent information about this data collection effort was sent on April 21, with a submission deadline of 11:59 PT April 23. Hospitals now trying to comply with the request are facing several technical challenges. For many hospitals, it is unclear who within the facility and/or the hospital system received these emails. For others, emails to authorized individuals are out of date or include conflicting or inaccurate information. We also have heard concerns that members that try to access the portal are being redirected to pages without knowing if those pages are trustworthy. In other cases, some hospitals simply have not received emails to register and access the portal.

For these technical issues, HHS has provided a telephone support line for the vendor, TeleTracking. We have learned that when hospitals turn to this hotline for assistance, they experience lengthy hold times, transfers to voicemail, or the line cutting out before reaching anyone or the ability to leave a voicemail. This has frustrated hospitals working to fulfill the agency's data collection request in such a short time frame.

Further, for hospitals that have been able to access the portal, there is a lack of clarity about the information the agency seeks and how it will be used. It is unclear which patients should be counted as a confirmed diagnosis, if or how presumptive cases should be captured, and the

intent of the collected data. We urge HHS to issue comprehensive, public guidance to hospitals that clearly communicates how the data should be reported and how the agency will use the data to inform the targeted distribution methodology.

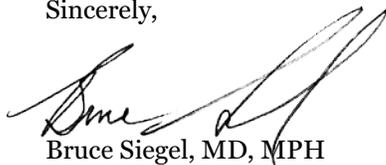
Payments from the COVID-19 provider relief fund, authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), are critical to essential hospitals on the front lines of this public health emergency. Essential hospitals are preparing for and responding to COVID-19—such as by increasing capacity through alternative care sites and ensuring staff capacity—and this has significantly increased their costs. At the same time, our member hospitals have experienced an abrupt drop in revenue due in part to the shift away from planned and elective procedures and other ancillary services to increase capacity for COVID-19 patients, preserve limited personal protective equipment, and minimize the virus' spread. While these actions are necessary given the situation, they result in severe cash flow concerns. Given essential hospitals' typically narrow margins and limited cash reserves, the COVID-19 epidemic has put many in a precarious position.

While we are encouraged the agency is developing a methodology to better target relief funds to hospitals that face an increased burden due to the pandemic, we are worried hospitals do not have adequate time to navigate the process to submit the data, given the numerous technical challenges with the portal. This request comes at a time when hospitals still are actively responding to and managing the outbreak. Faced with technical challenges and a lack of clarity on the data reporting needs, 48 hours is insufficient time to comply with the agency's request.

This data submission is a prerequisite for payment, which further underscores the need for HHS to conduct this data collection process publicly and accurately. Precise data collection is critical to ensure funds from the provider relief fund are appropriately targeted to hospitals most in need. **It is imperative HHS issue clear, public guidance on how to report the requested information and the intent of the collected data. The agency also must address all technical challenges and allow hospitals more time, at minimum until all technical issues are resolved, for data submission through the individualized portals.**

We look forward to continued engagement and partnership to mitigate the COVID-19 outbreak. If you have questions, please contact Senior Director of Policy Erin O'Malley at 202-585-0127 or eomalley@essentialhospitals.org.

Sincerely,



Bruce Siegel, MD, MPH
President and CEO