



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

February 21, 2014

Marilyn Tavenner, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Re: Administrative Simplification: Certification of Compliance for Health Plans

Dear Administrator Tavenner:

On behalf of the American Academy of Family Physicians (AAFP), which represents 110,600 family physicians and medical students across the country, I write in response to the "Administrative Simplification: Certification of Compliance for Health Plans" [proposed rule](#) as published in the January 2, 2014, *Federal Register*. This rule would require that controlling health plans (CHPs) demonstrate compliance with the adopted standards and operating rules for three electronic transactions: eligibility for a health plan, health care claim status, and health care electronic funds transfers and remittance advice. This proposed rule would also establish penalty fees for a CHP that fails to comply with certification requirements.

The AAFP supports the CMS proposals that outline requirements for plans to demonstrate they are in compliance with these three operating rules. We also support the CMS proposals that stipulate penalties the plan(s) would incur for noncompliance. The AAFP appreciates that CMS encourages the development of a consistent testing process so that plans may better achieve and demonstrate compliance.

The AAFP believes that administrative simplification represents an industry-wide commitment to reducing health care costs by strengthening the electronic exchange of data, and by removing unnecessary burdens throughout the compliance, claims and billing processes. The AAFP supports these objectives and is continuously working to alleviate demands placed on family physicians through entangling paperwork and needless regulatory complexities. Therefore, the AAFP continues to support the valuable role of standards and operating rules developed by the Council for Affordable Quality Healthcare's (CAQH) Committee on Operating Rules for Information Exchange. The AAFP proudly participates on the CAQH as one of over 100 health care industry stakeholders committed to modernizing and simplifying health care administration.

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We appreciate the opportunity to provide these comments and make ourselves available for any questions you might have. Please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'J' and 'C' followed by a long horizontal line.

Jeffrey J. Cain, MD, FAAFP
Board Chair