



AMERICAN ACADEMY OF  
FAMILY PHYSICIANS  
STRONG MEDICINE FOR AMERICA

March 1, 2012

Marilyn Tavenner  
Acting Administrator  
Centers for Medicare & Medicaid Services  
Department of Health & Human Services  
Attention: CMS-0024-IFC  
P.O. Box 8013  
Baltimore, MD 21244-8013

Re: Administrative Simplification: Adoption of Standards for Health Care Electronic Funds Transfers (EFTs) and Remittance Advice

Dear Ms. Tavenner:

On behalf of the American Academy of Family Physicians (AAFP), which represents more than 100,300 family physicians and medical students nationwide, I write in response to the Centers for Medicare & Medicaid Services' (CMS) interim final [rule](#) with comment period titled *Administrative Simplification: Adoption of Standards for Health Care Electronic Funds Transfers (EFTs) and Remittance Advice* as published in the January 10, 2012 *Federal Register*.

The AAFP supported inclusion of administrative simplification provisions within the *Affordable Care Act* and is pleased that the agency released this interim final rule. Standards for electronic funds transfer and electronic remittance advice will modernize and enable meaningful electronic communications between health plans, financial institutions, and family physician practices. The regulation is effective Jan. 1, 2012, with all health plans required to comply by Jan. 1, 2014.

Despite our support for this interim final rule, the AAFP believes that an overwhelming number of costly, time consuming, and unnecessary processes in healthcare transactions continue to exist. As such, the AAFP strongly encourages CMS to fully implement Sec. 1104 administrative simplification provisions in an expedited manner. We eagerly look forward to working with CMS on a continued effort to identify and simplify administrative processes.

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

Sincerely,

Roland A. Goertz, MD, MBA, FFAFP  
Board Chair

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