



July 1, 2020

The Honorable Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Administrator Verma:

I am writing on behalf of the American Academy of Family Physicians (AAFP), which represents more than 136,700 family physicians and medical students nationwide. I write to ask the Centers for Medicare & Medicaid Services (CMS) to re-evaluate its current policy on the time requirements for discharge summaries from hospitals and post-acute care facilities and to require hospitals and post-acute care facilities to provide primary care physicians with discharge summaries within seven days.

Family physicians provide transitional care management (TCM) for their patients. Unfortunately, lack of communication by hospitals and post-acute care facilities regarding the transmission or release of discharge information often inhibits the effective provision of TCM by family physicians. The AAFP believes CMS can help correct this situation by updating its policy and rules related to timely sharing of discharge summaries by hospitals and post-acute care facilities.

We are aware that, in a March 2019 regulation entitled, "Medicare and Medicaid Programs; Patient Protection and Affordable Care Act; Interoperability and Patient Access for Medicare Advantage Organization and Medicaid Managed Care Plans, State Medicaid Agencies, CHIP Agencies and CHIP Managed Care Entities, Issuers of Qualified Health Plans in the Federally Facilitated Exchanges and Health Care Providers," CMS proposed to require hospitals participating in Medicare and Medicaid to send event notifications – also known as admission/discharge/transfer or ADT feeds – to community physicians. CMS discussed how electronic patient event notifications from hospitals, or clinical event notifications, are widely recognized as an effective tool for improving care coordination across settings, especially for patients at admission, discharge, and transfer. CMS discussed how these notifications are critical to improving patient safety through better care transitions and are key to enabling value-based care at scale. CMS has yet to release the corresponding final rule.

The AAFP has previously supported CMS proposals to mandate that hospitals and other facilities better inform primary care physicians about the discharge of their patients in a timely fashion. The AAFP also strongly supports the exchange of timely ADT information to a patient's primary care physician or medical home. We greatly appreciate CMS' push to make these

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transactions routine by hospitals, and we believe timely sharing of discharge summaries by hospitals and post-acute care facilities would be consistent with CMS efforts in this regard. Accordingly, we ask CMS to re-evaluate its current policy on the time requirements for discharge summaries from hospitals and post-acute care facilities and to require hospitals and post-acute care facilities to provide primary care physicians with discharge summaries within seven days.

Thank you for your time and consideration of this matter. Please contact Mr. Kent Moore, Senior Strategist for Physician Payment, at (913) 906-6398 or [kmoore@aafp.org](mailto:kmoore@aafp.org) with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "John Cullen", with a stylized flourish at the end.

John Cullen, MD  
Board Chair