Dear KHCA/AHCA Members:

We need you - and as many people in your organization as possible - to submit individual comments to CMS in support of proposed changes that will reduce administrative paperwork burden on your centers.

**Background**

On July 16, the Centers for Medicare & Medicaid Services (CMS) issued the [proposed rule](#) that aims to ease some of the administrative and paperwork burdens of the Requirements of Participation (RoPs).

The proposed rule includes changes to the current long-term care RoPs and survey process designed to reduce excessively burdensome and overly prescriptive regulations, while allowing centers to focus on providing high-quality care. AHCA has provided a detailed summary of the proposed rule [here](#).

Many of the changes AHCA advocated for are included in this proposed rule. In some cases, CMS did not accept AHCA's recommendations, and CMS provides its rationale for these decisions in the preamble to the proposed rule. The proposed rule, however, provides a 60-day public comment period that provides AHCA and all of you an opportunity to submit comments to CMS.

**Take Action Now!**

It is easy to submit a letter, and your comments do not need to be very long. In the letter, it is important that you provide targeted feedback on areas where CMS has asked for additional information and insight, and areas you believe have the biggest impact on your ability to provide quality care to your residents.

We have developed for your use a [template comment letter](#) available [here](#). In addition, you'll find [here](#) a summary document listing the regulatory areas where CMS has proposed changes and where CMS has specifically asked for additional public comments. These resources and templates are also available on the RoP ahcancaLED page [here](#).

Please note that the template letter must be personalized to your center before submitting to CMS.
The deadline for comment submission is 4:00 pm Central Time on Monday, September 16, 2019, however we encourage you to submit your comments as soon as possible. Additionally, we ask that members email their concerns and any suggested changes to this rule to AHCA’s Regulatory team at regulatory@ahca.org no later than August 16, 2019 so that we can consider your comments for inclusion in AHCA’s comments to CMS. Please also send a copy of your final comment letters to regulatory@ahca.org.

Tips on Organizing Your Comments
Your comments do not need to be long. A meaningful paragraph about how the proposed rule will affect your organization, your staff, and your residents will have significant impact. You can submit your comments electronically or by regular mail.

A Few Guidelines to Keep in Mind
- As you are preparing your comments, be sure to keep the focus on the beneficiaries – your patients and residents - rather than on your business or operational results.
- The more personalized you can make your comments, the better. Use your own circumstances and your own examples to drive home your message. Emphasizing how CMS’ proposed changes will or will not put patients over paperwork is a useful way to communicate your request.
- Submit comments on behalf of yourself rather than your company or another third party. NOTE: Please do not submit your comments on behalf of AHCA or your state association.

Where and How to Submit Your Comments
- When submitting comments, you need to refer to file code CMS-3347-P.
- CMS will NOT accept comments by fax transmission.
- You may submit comments in any one of the below three ways but only need to use one method (AHCA recommends submitting comments electronically):
  1. **Electronically.** You may submit electronic comments on this regulation to https://bit.ly/33cxW29 by clicking on “Comment Now” in the top right-hand corner of the page. For further instruction on how to submit your comments, view the Tips for Submitting Effective Comments at regulations.gov.
  2. **By regular mail.** You must allow sufficient time for mailed comments to be received before the close of the comment period (NOT postmarked). You can mail written comments to the following address:

        Centers for Medicare & Medicaid Services
        Attention: CMS-3347-P
        P.O. Box 8010
        Baltimore, MD 21244-1850.

  3. **By express or overnight mail.** You must allow sufficient time for mailed comments to be received before the close of the comment period (NOT postmarked). You may send written comments to the following address:

        Centers for Medicare & Medicaid Services
        Department of Health and Human Services
        Attention: CMS-3347-P
        Mail Stop C4-26-05
        7500 Security Boulevard
        Baltimore, MD 21244-1850.

Comments must be received no later than 4:00 p.m. Central Time on Monday, September 16, 2019.
Thank you for your time and support. Together, we can make a difference for quality care.

If you have any questions, please send them to regulatory@ahca.org.