The Centers for Medicare and Medicaid Services (CMS) received comments from a Hospital Association related to CMS-10752. This is the reconciliation of the comments.

Comment:

The Centers for Medicare and Medicaid Services (CMS) received a comment a Hospital Association suggesting that CMS clarify on the form that health systems can submit one waiver request form for multiple facilities by allowing for the submission of multiple organization identification numbers – such as multiple CMS Certification numbers (CCNs) – for each impacted facility in their system.

Response:

CMS appreciates the clarification suggested by this commenter. While the web form allows for the submission of one waiver request for multiple organizations and instructs users to "Indicate all applicable identification numbers for the healthcare facilities/providers with your organization impacted by the PHE" via the help language on the form, we agree that clarifying this further is prudent. We will include this enhancement in a future release.

Comment:

The Centers for Medicare and Medicaid Services (CMS) received a comment a Hospital Association expressing concern about the requirement for providers to report the status of their beneficiaries and operations directly to CMS will result in duplicative data reporting requirements for hospitals during an emergency. *The Hospital Association urges CMS to ensure that hospitals are not responding to multiple data requests during disasters or emergencies.*

Response:

CMS appreciates the concern expressed by this commenter. CMS has a responsibility to monitor and ensure adequate access to medical and health resources during an emergency. Standardized submission of this information directly by the provider during emergencies allows CMS to respond more quickly and effectively when providers need it most. We urge providers to submit this data using the webform, but we do not require it. CMS will continue to review options available to reduce or eliminate duplicative reporting.