PUBLIC SUBMISSION

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Administrative Simplification HIPAA Compliance Review (CMS-10662)

Comment On: CMS-2025-0007-0001
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General Comment

The irony is not lost that the "Administrative Simplification HIPAA Compliance Review" is asking healthcare providers to increase collection of useless data and increase reporting of what CMS itself can only acknowledge as non-actionable data.

There is zero need to collect and document this useless information.
CMS has not demonstrated that it has done anything productive with "documented" information related to these regulations in the past. Collection of and documentation of what is fairly frivolous information that is easily obtained simply from claims data for the number and percent of annual vaccination (data that CMS possesses but clearly has not used) can provide all the useful information that this data collection will accomplish without the duplicative and unnecessary paperwork and saving millions of dollars that can be put to better use.

This is a major regulation costing millions of dollars in direct costs and increases burden on healthcare providers. CMS has not demonstrated that the regulations will decrease the cost of care or decrease administrative costs or administrative burden.

CMS has not provided a reasonable, legitimate need to collect this information, as it has not demonstrated how this information collection has been "useful" and justifies the cost and burden of collection.

I request that the OMB declines CMS's request to further burden the American Healthcare system with its poorly thought-out regulatory demands to report low-value, fungible data.