

September 24, 2021

Submitted electronically via email to: paperwork@hrsa.gov

Acting Administrator Diana Espinosa
Health Resources & Services Administration
U.S. Department of Health and Human Services
5600 Fishers Ln
Rockville, MD 20852

Re: Agency Information Collection Activities: Proposed Collection: Public Comment Request; Information Collection Request Title: COVID-19 Provider Relief Fund Reporting Activities, OMB No. 0906-XXXX New

Dear Acting Administrator Espinosa,

Vizient, Inc. appreciates the opportunity to comment on the Health Resources & Services Administration (HRSA) Information Collection Request Title: COVID-19 Provider Relief Fund Reporting Activities, OMB No. 0906-XXXX New¹ (hereinafter, "Notice"), as the Provider Relief Fund (PRF) has a significant impact on our members and the patients they serve. In the Notice, HRSA indicates that providers who accepted the "Terms and Conditions" regarding their PRF payment(s) will be using the PRF Reporting Portal to submit information about their use of PRF payments, and that the agency is operating under a Paperwork Reduction Act Public Health Emergency (PHE) waiver. In anticipation of the PHE waiver expiring, HRSA is undergoing the OMB clearance process, as the data will be collected beyond the PHE.

Vizient, Inc. provides solutions and services that improve the delivery of high-value care by aligning cost, quality and market performance for more than 50% of the nation's acute care providers, which includes 95% of the nation's academic medical centers, and more than 20% of ambulatory providers. Vizient provides expertise, analytics, and advisory services, as well as a contract portfolio that represents more than \$100 billion in annual purchasing volume, to improve patient outcomes and lower costs. Headquartered in Irving, Texas, Vizient has offices throughout the United States.

In the Notice, HRSA seeks comment on aspects of reporting to the PRF Reporting Portal, including the accuracy of the estimated burden. HRSA anticipates the average burden per response for each of the four PRF reporting periods will be 5.6 hours. Vizient is concerned this amount is an extreme underestimate. Vizient is aware of members who are currently working to submit information to HRSA for the first reporting period and have already spent many hours in excess of the 5.6-hour estimate. These members are diligently following PRF announcements and evolving requirements while also working through budgets and plans for PRF funds.

In addition, it is unclear from the Notice how HRSA determined this reporting burden amount. Throughout the existence of the PRF, there have been numerous updates to the PRF

¹ 86 Fed. Reg. 40064

reporting requirements and interpretations, leading to consistently changing reporting obligations with different burdens for each reporting period. For example, the method by which lost revenue is determined has changed frequently and varies between providers, which can ultimately impact their reporting burden. Vizient urges HRSA to work more closely with providers to take a more holistic approach to assessing the reporting burden by considering the impact of the multiple changes, reporting methods and various employees involved in compiling information relevant to reporting. Vizient is concerned that underestimating the reporting burden now will improperly justify future, additional burdens, such as reporting of additional information or enforcing strict reporting deadlines. As such, Vizient believes it is critical that HRSA work to improve its estimate of PRF reporting burdens.

Also, Vizient appreciates HRSA's recent announcement² that an additional \$25.5B in funding will be released with the application cycle opening on September 29, 2021. HRSA has also provided information regarding the return of unused funds.³ Despite this information being provided, it is unclear how much funding remains to be distributed and how returned funds will be distributed. The Notice lists four PRF reporting periods, with Reporting Period 4 being for providers who received payments from July 1, 2021 to December 31, 2021. The Notice does not account for future distributions of remaining or returned funds. As a result, we are concerned that those funds may not be made available to providers. Assuming HRSA does intend to distribute these funds in 2022, we note related reporting requirements would also contribute to the expected reporting burden unaccounted for by the Notice. Vizient urges HRSA to ensure that all PRF funds, including returned funds, ultimately reach providers through PRF distributions and the reporting burden is accurately assessed.

Conclusion

Vizient appreciates HRSA's efforts to effectively administer the PRF and engage to gain stakeholder feedback. We believe this provides a significant opportunity to help inform the agency on the administrative burden associated with the PRF.

Vizient membership includes a wide variety of hospitals ranging from independent, community-based hospitals to large, integrated health care systems that serve acute and non-acute care needs. Additionally, many are specialized, including academic medical centers and pediatric facilities. Individually, our members are integral partners in their local communities, and many are ranked among the nation's top health care providers. In closing, on behalf of Vizient, I would like to thank HRSA for providing the opportunity to comment on this important Notice. Please feel free to contact me, or Jenna Stern at jenna.stern@vizientinc.com, if you have any questions or if Vizient may provide any assistance as you consider these issues.

Respectfully submitted,



Shoshana Krilow
Senior Vice President of Public Policy and Government Relations
Vizient, Inc.

² <https://www.hhs.gov/about/news/2021/09/10/hhs-announces-the-availability-of-25-point-5-billion-in-covid-19-provider-funding.html>

³ <https://www.hrsa.gov/provider-relief/faq/general>