



**AMERICAN ACADEMY OF  
OTOLARYNGOLOGY—  
HEAD AND NECK SURGERY**

September 1, 2017

SUBMITTED VIA ELECTRONIC FILING

Administrator Seema Verma  
Department of Health and Human Services  
Centers for Medicare & Medicaid Services  
CMS-1677-F  
P.O. Box 8011  
Baltimore, MD 21244-1850

Re: Fiscal Year 2018 Medicare Hospital Inpatient Prospective Payment System and Long-Term Acute Care Hospital Prospective Payment System Final Rule

Dear Administrator Verma:

On behalf of the American Academy of Otolaryngology—Head and Neck Surgery (AAO-HNS), I am pleased to submit the following comments on the Fiscal Year 2018 Medicare Hospital Inpatient Prospective Payment System and Long-Term Acute Care Hospital Prospective Payment System Final Rule, published in the Federal Register as a proposed rule on August 2, 2017.

In the notice of rulemaking, CMS proposed that each national advanced diagnostic imaging accrediting organization (AO) would be required to make all Medicare advanced diagnostic imaging final accreditation survey reports as well as acceptable plans of correction (POC) publicly available on its website within 90 days of being available to the supplier of advanced diagnostic imaging services for the most recent three years. While the Academy appreciated CMS' intent to increase transparency, we stated that this proposal would have not only increased the administrative burden on advanced diagnostic imaging AOs, it could have had adverse effects on the nature of private accreditation processes and resulted in the release of information that is difficult for consumers to access and understand. The Academy agreed with the Intersocietal Accreditation Commission (IAC)'s comments that any additional transparency to be achieved by the proposed amendment to the regulations at 42 CFR 414.68 would not outweigh the burden of the amendment and the Academy opposed the proposed amendments to the regulations at 42 CFR 488.5 and 42 CFR 414.68. ***The AAO-HNS appreciates that CMS took our comments into consideration and did not include this proposal in the final rule.***

Sincerely,

*James C. Denny III*

James C. Denny, III, MD, FACS  
Executive Vice President and CEO

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