



March 1, 2024

Xavier Becerra, JD
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

RE: Cyberattack on Change Healthcare & Impact on Emergency Medicine Practices

Dear Secretary Becerra:

The Emergency Department Practice Management Association (EDPMA) requests your assistance with the implications of the ongoing cyberattack on Change Healthcare. EDPMA is the nation's only professional trade association focused on the delivery of high-quality, cost-effective care in the emergency department. EDPMA's membership includes emergency medicine physician groups of all sizes, billing, coding, and other professional support organizations that assist healthcare clinicians in our nation's emergency departments. Together, EDPMA members see or support 60% of all annual emergency department visits in the country.

This situation has devastated physician practice cash flow. Suggestions that medical practices can simply move to a new clearinghouse fail to acknowledge the length of time required to partner with a new clearinghouse, and the administrative burden of that process. Many small practices may not even know how to go about switching clearinghouses. Similarly, switching to paper claims is not a meaningful suggestion, since many payers now only accept electronic submissions. While we realize that federal security agencies such as the Federal Bureau of Investigation (FBI) are addressing the cyberattack itself, with the full impact of this cyberattack on emergency medicine practices and the health care system overall yet to be realized, we are writing to request that the U.S. Department of Health and Human services take several actions to protect providers under its purview.

We request that HHS:

- Immediately provide opportunities to increase practice cash flow, such as providing flexibilities for the Medicare Advanced and Accelerated Payments Program similar to the expansion of the program during the COVID-19 public health emergency (PHE);
- Increase its investigatory efforts to quantify the full impact of the cyberattack;

- Given overwhelming staffing pressures to address the ongoing crisis, investigate and provide flexibilities as it relates to physician reporting programs, such as the Merit-Based Incentive Payments System (MIPS), particularly given the upcoming MIPS 2023 reporting deadline on April 1, 2024, including reopening the [Extreme and Uncontrollable Circumstances \(EUC\) application](#) for 2023 performance year, which closed on Jan. 2, 2024; and
- Increase outreach to physician practices, hospitals, and revenue cycle management entities to communicate updates on the cyberattack and on any actions by HHS in response.

We appreciate the effort that the Administration has already directed to this unprecedented attack on our health care system. If we can provide any additional information or assistance, please do not hesitate to contact EDPMA's Executive Director, Cathey Wise, at cathey.wise@edpma.org.

Sincerely,

Andrea Brault

Andrea Brault, MD, MMM, FACEP
Chair
Emergency Department Practice Management Association