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April 26, 2023

The Honorable Virginia Foxx
Chair
House Education and Workforce Committee
Washington, DC 20515

The Honorable Bobby Scott
Ranking Member
House Education and Workforce Committee
Washington, DC 20515

The Honorable Robert Good
Chair, Subcommittee on Health, Employment,
Labor, and Pensions
House Education and Workforce Committee
Washington, DC 20510

The Honorable Mark DeSaulnier
Ranking Member, Health, Employment, Labor,
and Pensions Subcommittee
House Education and Workforce
Washington, DC 20515

Dear Chairman Foxx, Ranking Scott, Chairman Good, and Ranking Member DeSaulnier:

Every American deserves peace of mind when it comes to their health care, but too many are struggling to afford the health coverage and care they need. The Blue Cross Blue Shield Association (BCBSA) is committed to advancing common-sense solutions that can make a meaningful impact to improve care and lower costs for every American family, and we appreciate your leadership in holding today's hearing, **"Reducing Health Care Costs for Working Americans and Their Families."**

BCBSA is a national federation of 34 independent, community-based and locally operated Blue Cross and Blue Shield (BCBS) companies that collectively cover, serve, and support 1 in 3 Americans in every ZIP code across all 50 states and Puerto Rico. Our mission is simple: we want every single American to have affordable access to high-quality care. BCBS companies across the country work every day with local and national partners to tackle high costs so everyone can access the care they need regardless of how they get their coverage. As the underlying prices for medical care, health care services and prescription drugs continue to rise at unsustainable rates, we know we cannot address this affordability crisis alone. We have developed a comprehensive set of policy recommendations – [Affordability Solutions for the Health of America](#) – that, together, would save patients, consumers, and taxpayers **\$767 billion in over ten years.**

A critical step in reducing health care costs is to advance solutions that will protect patients from unreasonable and unwarranted cost increases for the care they receive. We applaud the committee for considering legislation that would require **fair and transparent billing for professional health care services.** All too often, after a big hospital or dominant health system acquires a community physician practice, the practice begins billing health insurance as if the patient's care was delivered at the hospital.

Fair and transparent billing would ensure that payments for patient care accurately reflect where the care was delivered, not where reimbursement can be maximized. That is why CMS should require off-campus hospital sites to obtain and bill using a different national provider identifier (NPI) than the main campus. Additionally, hospitals should be required to use the correct professional paper and electronic billing forms when billing for their off-campus outpatient sites. When these appropriate billing protections are in place, health insurance providers can accurately differentiate between care settings and apply the correct payment rates – which in turn would lower premiums and out-of-pocket costs for consumers.

Thank you again for your leadership and commitment to lowering health care costs for all Americans. We look forward to continuing to work with you to advance solutions that deliver real results for every American and every community. If you have any questions regarding our Affordability Solutions, please contact me or my colleague, Keysha Brooks-Coley, vice president of advocacy, at Keysha.Brooks-Coley@bcbsa.com.

Sincerely,

A handwritten signature in black ink, appearing to read "David Merritt". The signature is fluid and cursive, with the first name "David" and last name "Merritt" clearly distinguishable.

David Merritt
Senior Vice President, Policy and Advocacy
Blue Cross Blue Shield Association