



November 3, 2011

The Honorable Peter Roskam  
507 Cannon House Office Building  
United States House of Representatives  
Washington, D.C. 20515

The Honorable John Carney  
1429 Longworth House Office Building  
United States House of Representatives  
Washington, D.C. 20515

Dear Representatives Roskam and Carney:

Thank you for giving the National Health Care Anti-Fraud Association the opportunity to review the draft legislative language you plan to introduce in the House titled, "Medicare and Medicaid Fighting Fraud and Abuse to Save Taxpayers' Dollars Act" or the "Medicare and Medicaid Fast Act." It is our understanding that this legislation would be the companion to Senate 1251.

Founded in 1985, the National Health Care Anti-Fraud Association (NHCAA) is the only national organization focused exclusively on the fight against health care fraud. With members representing private health insurers as well as public-sector law enforcement and regulatory agencies having jurisdiction over health care fraud committed against both private payers and public programs, NHCAA has considerable experience tracking fraud trends and anticipating the best ways to combat them. A list of our members is attached.

There are several very good ideas included in The Fast Act that would help bolster fraud-fighting efforts. Title III, Section 301 titled "Improving data sharing across agencies and programs," is of particular interest to us. NHCAA was founded on the idea that sharing investigative information is critical to successfully combating health care fraud.

Your bill describes a plan to permit Medicare program safeguard contractors (PSCs) and "other oversight contractors" such as Zone Program Integrity Contractors (ZPICs), Recovery Audit Contractors (RACs) and the special investigations units of Medicare contractors access to relevant government data as a means to improve fraud fighting. The legislation also includes a provision to expand access to the integrated data repository (IDR) established under the Affordable Care Act to "relevant State agencies," including state Medicaid plans, CHIP plans and Medicaid Fraud Control Units.

Sharing information and data with contractors of federal health programs and with state health programs is crucial to the success of anti-fraud efforts. Consistent with this concept, we also would urge that, as CMS and the HHS-OIG move forward with data consolidation and analytics, the information developed from Medicare and Medicaid data on emerging fraud schemes and

trends and their geographic locations be shared with private insurers and other non-governmental stakeholders to ensure the most effective and comprehensive focusing of anti-fraud resources, and to enhance the private-public partnership against health care fraud.

We congratulate you on a fine piece of legislation and look forward to its introduction. If NHCAA can provide additional assistance we'd be pleased to do so.

Sincerely,



Louis Saccoccio  
Executive Director

enclosure