



July 13, 2020

Dr. Cara M. Christ, M.D., M.S.
Director
Arizona Department of Health Services
150 North 18th Avenue
Phoenix, Arizona 85007

RE: Notice of Proposed Rulemaking: Radiation Control Fees

Dear Dr. Christ:

On behalf of the Arizona Hospital and Healthcare Association (AzHHA) and our more than 80 hospital, healthcare, and affiliated health system members, thank you for the opportunity to offer comments on the Arizona Department of Health Services' (ADHS) Notice of Proposed Rulemaking: Radiation Control Fees (Notice of Rulemaking Docket Opening: 26 A.A.R. 762, April 24, 2020). AzHHA represents general acute care, rural, specialty, post-acute care, federal, tribal, and public hospitals, as well as affiliated healthcare partners. Our members are united with the common goals of improving healthcare delivery, access, and quality of care throughout the state. We submit these comments in furtherance of these goals.

AzHHA recognizes that the radiation control fees support an indispensable public safety function. We understand that fees have not been increased for over a decade and that the fees are currently insufficient to cover the department's expenses in regulating the use and users of radiation in the state. While we remain respectful of those facts, at this juncture, any fee increase on hospitals and healthcare providers constitutes a hardship.

AzHHA's national partner, the American Hospital Association, has estimated that hospitals' total losses in 2020 will approximate \$323 billion due to COVID-19. These losses do not account for currently increasing case rates in certain states, like Arizona, or potential subsequent surges of the pandemic later in the year. Arizona's hospitals are under a great deal of financial strain due to this public health emergency and will be for the foreseeable future. In particular, the pandemic is proving to be a very serious threat to the financial viability of rural hospitals, which were already operating on razor thin margins. Put plainly, hospitals are in dire need of financial assistance and are unable to absorb any additional losses at this time.

Consequently, AzHHA must respectfully request that ADHS defer the imposition of the proposed radiation control fee increases that affect hospitals and other health care providers. We would welcome the opportunity to engage with ADHS regarding alternative approaches to ensuring the financial solvency of the radiation control program.

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We greatly value the partnership between ADHS and the states' hospitals, and we look forward to continuing to work with you to achieve our shared goals of promoting the health of Arizonans and ensuring that all have access to optimal health care during this public health emergency.

Thank you for your consideration, and we look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann-Marie Alameddin".

Ann-Marie Alameddin
President and Chief Executive Officer
Arizona Hospital and Healthcare Association