



ELECTRONIC SUBMISSION VIA [OIRA\\_submission@omb.eop.gov](mailto:OIRA_submission@omb.eop.gov)

February 10, 2014

CMS Desk Officer  
Office of Management and Budget  
Office of Information and Regulatory Affairs

RE: Document identifier: CMS—10501

Dear Madam or Sir:

On behalf of the National Health Care Anti-Fraud Association (NHCAA), I am writing in response to the notice published in the January 10<sup>th</sup> issue of the Federal Register with document identifier CMS—10501, relating to information collection activities of the Healthcare Fraud Prevention Partnership (HFPP).

Established in 1985, NHCAA is the leading national organization focused exclusively on combating health care fraud and abuse. We are unique among associations in that we are a private-public partnership—our members comprise the nation’s most prominent health insurance plans as well as those federal, state and local government law enforcement and regulatory agencies having jurisdiction over health care fraud which participate in NHCAA as law enforcement liaisons. NHCAA’s mission is to protect and serve the public interest by increasing awareness and improving the detection, investigation, civil and criminal prosecution and prevention of health care fraud and abuse.

The Healthcare Fraud Prevention Partnership was established by charter in 2012 as a joint initiative by the U.S. Department of Health & Human Services and the Department of Justice to detect and prevent the prevalence of health care fraud through data and information-sharing. The HFPP is a voluntary public-private partnership between the Federal government, state officials, private health insurance organizations, and health care anti-fraud associations which aims to foster a proactive approach to fraud fighting across all public and private payers.

NHCAA has actively supported the development of the HFPP from its earliest stages and participates at all levels. We have signed the HFPP’s Memorandum of Understanding and are represented on the HFPP Executive Board, as well as its two key committees, the Data Analysis and Review Committee (DARC) and the Information Sharing Committee (ISC).



NHCAA believes the HFPP holds great promise for more effective fraud fighting in our nation's health care system. As envisioned, public health care programs and private insurance payers would identify methods to coordinate nationwide sharing of health claims information. Our nearly 30 years as a champion and facilitator of a private-public partnership has taught us that information sharing among private and public payers works in fighting fraud.

Several NHCAA insurer members operating in the private insurance sector have joined the HFPP as participating entities. It is our hope that the HFPP will be able to expand to include all health insurers who wish to participate and are willing to share data and information under the processes established by the partnership.

We believe the description of the collection request in the Federal Register notice is accurate and strongly encourage OMB to approve the request so that the HFPP can realize its full potential.

Thank you for the opportunity to comment. We would be happy to answer any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Saccoccio", is written on a light-colored rectangular background. The signature is fluid and cursive, with a prominent initial "L" and a long, sweeping underline.

Louis Saccoccio  
Chief Executive Officer