March 16, 2020

The Honorable Alex Azar  
Secretary  
Department of Health and Human Services  
200 Independence Avenue  
Washington, DC 20201

Dear Secretary Azar:

As you continue the critical task of managing the federal response to the COVID-19 pandemic, we wish to alert you to ways that the 5,800 ambulatory surgery centers across the US can and should be used to assist our hospital partners in managing this crisis. With the growing concern that hospitals may be overwhelmed by a surging number of infected patients, the Centers for Disease Control and Prevention (CDC) has recommended that some inpatient surgeries be shifted to outpatient settings, when feasible. However, there has been conflicting guidance about elective surgeries from the Office of the Surgeon General that indicates additional guidance is warranted.

The Ambulatory Surgery Center Association (ASCA) has consulted with clinical experts in our community and the consensus position is that ASCs can continue to provide safe surgical care for patients whose condition cannot wait until hospitals return to normal operations. As a critical component of the healthcare system, we are keenly aware of how our actions can materially impact the health of the communities that we serve and recommend the following guidelines for the continuation of urgent/needed care in our ASCs:

- Keeping facilities open for elective urgent surgeries
- Assessing and optimizing patients’ medical and social risk factors for planned surgeries, and postponing cases where indicated, including:
  - reassessing and reprioritizing all currently scheduled cases and postponing based on the current and projected COVID-19 cases in the facility and the surrounding area and when doing so will not result in significant medical deterioration or materially impact the patient’s prognosis, morbidity or treatment plan
  - Acknowledging that every patient encounter is unique and postponement decisions must represent a joint decision between the treating clinician and the patients
- Implementing rigorous screening for patients and visitors prior to entering the facility
- Maintaining a safe environment for patients, employees and visitors, including adherence to social distancing recommendations
- Implementing enhanced cleaning as directed by CDC guidelines
- Working within the capacity of the supply chain to ensure that hospitals have priority for necessary equipment/supplies
- Collaborating with hospitals and health systems to coordinate care based on each community’s individual needs
ASCs can serve as alternative settings that provide surgical care for those patients who would suffer from a delay, while allowing our local hospital partners to create the incremental capacity needed during these dynamic times. As the pandemic progresses, we will continue to assess our approach, in coordination with experts throughout the healthcare system, to best serve the needs of patients and communities.

In closing, we stand ready to work with you, state and local governments, and all our colleagues in the healthcare system to provide needed care during these challenging times. Please feel free to contact me if there is anything that the Ambulatory Surgery Center Association or our members can do to assist you.

Sincerely,

[Signature]

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