NOVEMBER 10, 2026

AFFHP JOINT STATEMENT IN SUPPORT OF CMS'S FINAL SITE-NEUTRAL IMAGING POLICY

The Alliance for Fair Health Pricing (AFFHP) applauds the Centers for Medicare & Medicaid Services (CMS) for finalizing site-neutral payments for imaging services in the 2027 Hospital Outpatient Prospective Payment System (OPPS) Rule. This is a win for patients and taxpayers and builds on the Administration's previous efforts to extend site-neutral payments to drug administration and off-campus clinic visits.

Affordability was a central issue in the 2026 midterm election. Voters sent a clear message that they want lower costs, including for health care. The final rule is a concrete step toward delivering those savings.

Routine imaging can be safely provided in a doctor's office at a lower cost. Yet, more imaging services have moved to higher-cost hospital outpatient departments (HOPDs). An analysis found that about 400,000 Medicare patients paid at least $50 more out of pocket for imaging at off-campus HOPDs in a single year than they would have under site-neutral payments.

Patients should not pay more for the same routine care simply because a hospital owns the building. Beginning in 2027, the new OPPS rule will bring Medicare payments for certain imaging services in line with rates paid in independent physician offices. CMS estimates this change will save patients and taxpayers $260 million in 2027 and more than $9 billion over the next decade.

We strongly encourage Congress to build on this momentum and enact comprehensive site-neutral payment reforms. A recent AFFHP poll found that 87% of voters favor preventing hospitals from charging more than doctors' offices for the same outpatient services. The Alliance for Fair Health Pricing stands ready to work with policymakers to make health care more affordable for patients, employers, and taxpayers alike.

Sincerely,

American Benefits Council

Blood Cancer United

ERIC The ERISA Industry Committee

Arnold Ventures

PBGH Purchaser Business Group on Health

FAMILIESUSA The Voice for Health Care Consumers

Small Business Majority