

July 8, 2026

**AFFHP JOINT STATEMENT IN SUPPORT OF THE SITE-NEUTRAL IMAGING POLICY IN THE PROPOSED 2027
HOSPITAL OUTPATIENT PROSPECTIVE PAYMENT SYSTEM (OPPS) RULE**

The Alliance for Fair Health Pricing applauds the Centers for Medicare & Medicaid Services (CMS) for including [site-neutral payments for imaging services](#) in the proposed 2027 Hospital Outpatient Prospective Payment System (OPPS) Rule. Importantly, this change builds on the Administration's efforts last year to implement site-neutral payments for drug administration.

As it stands today, large hospitals and health systems are buying up physician offices, rebranding them as hospital outpatient facilities, and charging higher prices for the same routine services, even when nothing has changed except the name on the door. Medicare and the privately insured currently pay up to [4x more](#) for the [exact same](#) service delivered in a hospital-owned setting. Imaging is no exception, with patients increasingly steered into higher-cost hospital settings for routine scans, driving up costs without a marked improvement in the quality of care.

Site-neutral payment policy for imaging services is an important step towards lowering health care costs for patients and employers. CMS and the Administration must continue to build on this momentum by expanding site-neutral payment reforms to other routine services. The Alliance for Fair Health Pricing stands ready to work with policymakers to advance a fair, transparent, and more affordable health care system for patients, employers, and taxpayers alike.

Sincerely,

