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December 4, 2020

Alex M. Azar, II

Secretary, Department of Health and Human Services

200 Independence Avenue, SW

Washington, DC 20201

Re: Securing Updated and Necessary Statutory Evaluations Timely, RIN
0991-AC24

Submitted Electronically

Dear Secretary Azar:

On behalf of the American Academy of Child and Adolescent Psychiatry (AACAP) and our 9,800 members, I am writing today to provide comments on the Department of Health and Human Services (HHS) proposed Securing Updated and Necessary Statutory Evaluations Timely (SUNSET) proposed rule.

AACAP is the professional home to child and adolescent psychiatrists, some of whom also treat adults and transitional age youth (age 18 years and above). Our mission includes promoting the healthy development of children, adolescents, and families. We therefore have a strong interest in federal regulations that impact the provision of healthcare and the practice of psychiatry.

The provisions of this proposed rule would require HHS to terminate, or sunset, existing regulations ten years after their issuance if the agency does not conduct an administratively burdensome and resource-intensive retrospective review of each regulation. AACAP is extremely concerned that the enormity of such a task will stretch thin the agency's resources, especially during the Covid-19 Public Health Emergency (PHE), threatening hundreds of longstanding and essential regulatory provisions. Moreover, given that the transition to a new administration is underway, the timing leaves much to be desired. AACAP believes that the responsibility for

promulgating major revisions to regulatory review requirements should be left to the next administration. **It is for these reasons that AACAP urges the withdrawal of the SUNSET proposals.**

We appreciate the opportunity to provide our thoughts on this proposed rule. Please contact Karen Ferguson, Deputy Director of Clinical Practice at kferguson@aacap.org with any questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Gabrielle A. Carlson". The signature is written in a cursive style and is followed by a long, sweeping horizontal flourish that extends to the right.

Gabrielle A. Carlson, MD
President