

July 19, 2022

The Honorable Ron Wyden
Chairman
Senate Finance Committee
U.S. Senate
Washington, DC 20510

The Honorable Mike Crapo
Ranking Member
Senate Finance Committee
U.S. Senate
Washington, DC 20510

The Honorable Richard Neal
Chairman
House Ways and Means Committee
U.S. House of Representatives
Washington, DC 20515

The Honorable Kevin Brady
Ranking Member
House Ways and Means Committee
U.S. House of Representatives
Washington, DC 20515

The Honorable Frank Pallone
Chairman
Energy and Commerce Committee
U.S. House of Representatives
Washington, DC 20515

The Honorable Cathy McMorris Rodgers
Ranking Member
Energy and Commerce Committee
U.S. House of Representatives
Washington, DC 20515

Dear Chairs and Ranking Members:

The proposed Medicare Physician Fee Schedule (MPFS) for calendar year 2023 (CY2023) released on July 7, 2022, by the Centers for Medicare & Medicaid Services (CMS) **once again undermines the long-term financial viability of physician practices and seniors' access to critical treatments and procedures, by implementing significant cuts in physician reimbursement. Community-based office setting specialty care is a critical part of the nation's healthcare infrastructure, and we are certain CMS' reimbursement policy will have repercussions for the future, impacting access and value.**

On behalf of the undersigned organizations, a coalition of national medical organizations, representing a broad range of physicians, health professionals and practice managers who care for Medicare beneficiaries in a community-based, office setting, **we respectfully urge Congress to begin immediate deliberations to identify and advance policies to mitigate the forthcoming reimbursement cuts. Absent action by Congress, the proposed payment reductions will take effect on January 1, 2023.**

Unfortunately, specialty physicians practicing in community-based office settings are again disproportionately impacted by CMS' proposed changes within the fee schedule. CMS is proposing to cut the Medicare conversion factor—the basic starting point for calculating Medicare payments—by approximately 4.5% for CY2023. **In addition, our members' payment reductions are compounded by the second year of CMS' phased in implementation of its clinical labor pricing update, which was finalized in the CY2022**

MPFS Final Rule. The clinical labor policy recognized the need for increased salary rates for all types of clinical labor (e.g., nurses and technologists). However, due to the budget neutrality constraints in the MPFS, the dramatic rise in direct practice expense costs resulting from the increase in clinical labor rates decreased reimbursement rates for those services with high supply and equipment costs when performed in a community-based office setting.

These cuts will also further exacerbate disparities in access to care and health outcomes among rural and minority populations by constraining - and in some cases preventing - physicians in community-based office settings from providing critical patient care to underserved populations. To avoid significant disruptions in patient access to care, Congress must **add new funding to the MPFS for the explicit purpose of increasing the non-facility/office-based practice expense relative value units (NF PE RVUs) negatively impacted by CMS' recent clinical labor policy.**

Our organizations appreciate Congress' continued engagement to provide greater stability within the MPFS. We look forward to collaborating to identify policies to reform the Medicare physician payment system, and to specifically protect against policy updates that generate disproportionate payment reductions across the provider community.

Alliance of Wound Care Stakeholders
American College of Cardiology
American College of Radiation Oncology
American College of Radiology
American College of Surgeons
American Society for Radiation Oncology
American Society of Diagnostic and Interventional Nephrology
American Society of Nephrology
American Society of Nuclear Cardiology
American Urological Association
American Vein & Lymphatic Society
American Venous Forum
Association of Black Cardiologists
CardioVascular Coalition
Dialysis Vascular Access Coalition
Outpatient Endovascular and Interventional Society
Renal Physicians Association
Society for Cardiovascular Angiography and Interventions
Society for Vascular Surgery
Society of Interventional Radiology
The Society of Thoracic Surgeons
United Specialists for Patient Access