

September 6, 2022

Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Attention: CMS-1770-P
P.O. Box 8016
7500 Security Boulevard
Baltimore, MD 21244-8016

RE: Medicare and Medicaid Programs; CY 2023 Payment Policies under the Physician Fee Schedule and Other Changes to Part B Payment Policies; Medicare Shared Savings Program Requirements; Medicare and Medicaid Provider Enrollment Policies, Including for Skilled Nursing Facilities; Conditions of Payment for Suppliers of Durable Medicaid Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS); and Implementing Requirements for Manufacturers of Certain Single-dose Container or Single-use Package Drugs to Provide Refunds with Respect to Discarded Amounts (CMS-1770-P)

Dear Administrator Brooks-LaSure:

The undersigned audiologists and speech-language pathologists (SLPs) who treat Medicare beneficiaries write to offer comments on the Calendar Year (CY) 2023 Medicare Physician Fee Schedule (MPFS) proposed rule. We are dismayed by the payment cuts that we and many of our colleagues from other specialties continue to face in 2023 because of the 2021 updates to office/outpatient evaluation and management (E/M) services. We appreciate that Congress has mitigated these cuts in previous years, however, it is difficult for our facilities and practices to face this ongoing uncertainty year after year. Therefore, we urge CMS to implement strategies within its authority to lessen the impact of the payment cuts and to actively engage with Congress to find short and long-term solutions to improve the stability of the Medicare payment system. It is critical that we work together to ensure continued access to medically necessary care for all Medicare beneficiaries.

Audiologists specialize in preventing, evaluating, and treating hearing and balance disorders. SLPs identify, evaluate, and treat speech, language, swallowing, and cognitive impairments. Medicare beneficiaries must have continued access to our medically necessary diagnostic and therapeutic services to meet their functional goals.

We understand that CMS must keep the MPFS budget neutral. While the nearly 4.5% cut to the conversion factor may be necessary to meet this mandate and would be devastating on its own, we also face additional cuts of up to 6% due to other legal requirements. This will cripple suppliers who deliver Part B services—including private practices and facilities—that are already struggling from significant economic challenges due to staffing shortages, inflation, and the ongoing COVID-19 pandemic.

We are extremely concerned that the cumulative impact of the payment cuts, the current economic climate, and the ongoing pandemic will leave us unable to sustain our practices. The cuts will further slow economic recovery and restrict both Medicare and non-Medicare patients' access to medically necessary services, including the essential hearing, balance, speech, language, swallowing, and cognitive services we provide.

Although we recognize CMS cannot solve this problem on its own, it is critical that all stakeholders partner to find viable short and long-term solutions to stabilize the Medicare payment system. **Therefore, we strongly urge CMS to carefully consider all possible strategies to mitigate the 2023 cuts and to work with Congress and stakeholders on long-term reforms to bring greater stability and equity to the Medicare payment system.** We cannot withstand annual payment reductions in this inflationary environment where nearly every cost in our personal and professional lives is increasing while our Medicare payment is decreasing yet again.

Thank you for the work you have done to improve Medicare coverage and beneficiary access during the pandemic and beyond. We appreciate CMS taking the time to consider our perspective as clinicians who provide critical services to Medicare beneficiaries, the patients who ultimately stand to suffer the most from these cuts unless solutions are found. We look forward to your continued efforts on behalf of Medicare enrolled providers and the patients we serve.

Sincerely,

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Megan Maloney, TX

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Heidi McMartin Heeringa, MI
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Marquitta Merkison, MD
Dawn Merth-Johnson, WI
Nataley Merz, IL
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Ansley Mess, GA
Samantha Messer, AL
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Teneshia Milligan Cavin, IL
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Emily Romano, TX
Kathy Romanowski, TX
Alyssa Rome, CA
Diane Romolino, CA
Alexa Ronayne, MN
Katherine Rorick, MO
Shannon Rose, NC
Lillian Rosenberg, FL
Jessica Roser, NV
Cheyanna Ross, OH
Sandra Ross, NJ
Kate Ross, VT
Byron Ross, TX
Meghan Rost, FL
Lexi Roth, AZ
Amanda Roy, MA
Renee Royles, CA
Marsha Rubenstein, NY
Jessica Rubinstein, CT
Anne Ruckdeschel, PA
Marcella Rudick, OH
Lisa Rueckel, FL
Madalyn Rueve, CA
Rachelle Ruffing, ID
Kimberly Rule, NJ
Stephanie Rushie, PA
Bethany Rushton, CA
Erin Russ, NY
Stacy Russell, TX
Alexandria Russell, PA
Janae Russell, LA
Antonia Russo, NJ
Julia Ryan, NY
Alissa Ryan, MA
Mona Ryan, OK
Hollea Ryan, FL
Diane Sabo, PA
Lauril Sachet, NM

Abby Sacia, WI
Susan Sackrison, NV
Gretchen Sadler, IA
Amanda Sadler, KY
Amandeep Saini, AZ
Kristen Salem, AZ
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Kristy Samuels, IN
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Darshell Sanderfer, FL
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Patricia Santana, FL
Jennifer Santer, MI
Alice Santillanes, TX
Nina Santus, GA
Marcia Sapiera, FL
Ally Saranita, OH
Deborah Sarfaty, NJ
Ashley Sarrol, NJ
Arantxa Saucedo, TX
Carly Saunders, WV
Micayla Sayers, TN
Alexa Scarlett, MA
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Ivy Schantz, MA
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Jessica Scheidt, NY
Jamie Schepp, FL
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Amanda Schilling, NC
Haley Schippers, KS
Mary Schlegel, IL
Megan Schliep, MA
Brittany Schmidt, FL
Melanie Schmidt, FL
Marne Schmitt, OH
Mikaely Schmitz, WI
Pam Schnaubert, TX
Angela Schneider, TX
Sarah Schneider, CA
Lily Schneiderman, CA
Debra Schoder, FL
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Andrea Schredl, PA
Dayna Schroeder, TX
Jessica Schulte, OH
Stephanie Schultheisz, PA
Lynette Schultz, FL
Lauren Schwabish, VA

Megan Schwar, IL
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Jennifer Schwind, TX
Patricia Schwinn, OH
Cecilia Scoe, MI
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Monica Scott, AR
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Kylie Seagroves, PA
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Jordyn Sebastian, MI
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Jessica Seguin, MI
Lila Bergman Seldin, CA
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Barbra Seltzer, NJ
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Leticia Serna, TX
Elisa Serrano, PA
Maddie Server, OH
Marie Severson, WI
Marissa Sewart, OR
Nicole Shaffer, FL
Monica Shaffer, CO
Pooja Shah, NJ
Erika Shakespeare, OR
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Pamela Sharrer, OH
Abby Sharrer, OH
Meredith Shatto, WA
Ilana Shaw, FL
Alita Shaw, WA
Laura Shea, OR
Caitlin Shea, MA
Tami Shea, PA
Laurie Sheehy, OH
Sarah Sheridan, NJ
Gabrielle Sherman, NY
Alison Shiel, NH
Melissa Shiers, AL
Christine Shumaker, PA
Amelia Shuster, VA
Meaghan Sica, NJ
Melissa Sides, MO
Lauren Siefring, OH
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Alice Silbergleit, MI
Ann Silcox, IN

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Sadie Simon, IN
Abbe Simon, NC
Linda Simpson, NJ
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Neeta Singh, FL
Jaspreet Singh, CA
Victoria Sisson, MO
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Sheila Smith, AL
Marjorie Smith, FL
Reese Smith, MO
Kristen Smith, CO
Allison Smith, OK
Kelly Smith, TX
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Heather Smith, PA
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Cheryl Stewart, TX
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Lindsay Stone, IN
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Catherine Stout, WI
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Cheri Tonnis, TX
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Tabitha Wallace, FL

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Rivkie Weingarten, NY
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Amanda Weissberg, TX
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Rondi Whitney, VT

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Donna Wilhite Noyes, TX
Alyssa Wilkinson, OH
Audra Wilks, RI
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Haley Willis, CA
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Andrew Wilson, FL
Paige Wilson, MO
Chelsea Wilson, MO
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Wendy Wingard-Gay, SC
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Kim Winter, CT
Alison Winter, SD
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Susan Wohlford, VA
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Jennifer Wolff, VA
Keith Wolgemuth, CA
Kathy Wong, VA
Nichole Wood, FL
Dave Woods, ID
Kasey Woods, GA

Jeannie Woody, SC
Jeremy Woody, AR
Kelly Worman, NJ
Barbara Worth, MA
Susan Wortsman, NY
Grace Wright, OH
Salleann Wyatt, FL
Samantha Wyatt, FL
Jordyn Wynn, TX
Anne Wyville, FL
Susan Yaffe-Oziel, MD
Sky Yang, CA
Kristin Yardley, ID
Heather Ybarlucea, ID
Hazley Yeager, PA
Alissa Yeargin, SC
Melissa Yearicks, NJ
Patricia Yee, CA
Alexis Yero, FL
Audra Yetter, MT
Rena Yosupova, NY
Kristyn Young, WV
Elizabeth Young, UT
Amy Young, OH
Kathy Young, NC
Alexandria Zachos, IL
Sydney Zafran, KS
Kaci Zambelli, FL
Elham Zamora, FL
Carole Zangari, FL
Gail Zanzalari, NJ
Regina Zappi, MD
Michelle Zeglin, IL
Hailey Zehner, SC
Jocelyn Zeleny, SC
Meredith Zemke, MT
Cynthia Zepeda King, TX
Cathy Zhao, NC
Leah Ziegler, SC
Ardie Zimmerman, OH
Maria Zirolecki, PA
Tim Zmudka, MI