May 18, 2018

The Honorable Orrin G. Hatch  The Honorable Ron Wyden
Chairman, Senate Finance Committee  Ranking Member, Senate Finance Committee
U.S. Senate  U.S. Senate
Washington, DC 20510  Washington, DC 20510

Dear Chairman Hatch and Ranking Member Wyden:

On March 20, 2018, legislation (S. 2575) was introduced in the U.S. Senate and referred to your Committee for consideration. S. 2575 would inappropriately give audiologists unlimited direct access to Medicare patients without a physician referral and amend Title XVIII of the Social Security Act to include audiologists in the definition of “physician.” The undersigned groups strongly urge you to oppose S. 2575.

As legislators, we know you share a physician’s commitment to promoting patient safety and the highest quality healthcare. While audiologists are valued health professionals who work for and with physicians, they do not possess the medical training necessary to perform the same duties as physicians, nor are they able to provide patients with the medical diagnosis and treatment options they require. And, most audiologists practice in the same areas as MD/DO physicians. So, claims that expanding the services provided by audiologists will somehow mitigate projected MD/DO physician shortages are often unsubstantiated.

Further, bypassing a physician evaluation and referral can lead to missed diagnoses and inappropriate treatment that could cause lasting, and expensive, harm to patients. The Centers for Medicare & Medicaid Services (CMS) has maintained a position that physician referral is a “key means by which the Medicare program assures that beneficiaries are receiving medically necessary services, and avoids potential payment for asymptomatic screening tests that are not covered by Medicare ….”

Notwithstanding the patient safety concerns associated with direct access, the inclusion of audiologists in Medicare’s definition of “physician” will create confusion regarding the qualifications and training of various healthcare providers. And, broadening the term “physician” to include non-physician healthcare providers encroaches on the expert status achieved by MD/DO physicians. Audiologists are not physicians and should not be considered as such under the Medicare program.

For the above-stated reasons, we respectfully urge you to oppose any efforts to advance S. 2575. Thank you for your consideration, and please contact the American Academy of Otolaryngology-Head and Neck Surgery at legfederal@entnet.org with any questions.

National Organizations
American Academy of Dermatology Association
American Academy of Facial Plastic and Reconstructive Surgery
American Academy of Neurology
American Academy of Ophthalmology
American Academy of Otolaryngic Allergy
American Academy of Otolaryngology—Head and Neck Surgery
American Association of Child and Adolescent Psychiatry
American Association of Neurological Surgeons
American Association of Orthopaedic Surgeons
American Broncho-Esophagological Association
American College of Osteopathic Surgeons
American College of Rheumatology
American College of Surgeons
American Laryngological Association
American Medical Association
American Neurotology Society
American Osteopathic Association
American Osteopathic Colleges of Ophthalmology and Otolaryngology—Head and Neck Surgery
American Otological Society
American Psychiatric Association
American Rhinologic Society
American Society of Anesthesiologists
American Society of Breast Surgeons
American Society of Cataract and Refractive Surgery
American Society of Colon and Rectal Surgeons
American Society of Geriatric Otolaryngology
American Society of Pediatric Otolaryngology
American Society of Plastic Surgeons
Association of Otolaryngology Administrators
Congress of Neurological Surgeons
National Association of Spine Specialists
Renal Physicians Association

State Medical Associations
Alaska State Medical Association
Arizona Medical Association
Arkansas Medical Society
California Medical Association
Connecticut State Medical Society
Hawaii Medical Association
Indiana State Medical Association
Kansas Medical Society
Kentucky Medical Association
Louisiana State Medical Society
Maine Medical Association
Massachusetts Medical Society
MedChi, The Maryland State Medical Society
Medical Association of Georgia
Medical Association of the State of Alabama
Medical Society of Delaware
Medical Society of the District of Columbia
Medical Society of the State of New York
Medical Society of Virginia
Michigan State Medical Society
Minnesota Medical Association
Mississippi State Medical Association
Missouri State Medical Association
Montana Medical Association
Nebraska Medical Association
New Hampshire Medical Society
New Mexico Medical Society
North Carolina Medical Society
North Dakota Medical Association
Ohio State Medical Association
Oklahoma State Medical Association
Pennsylvania Medical Society
Puerto Rico Medical Society
South Carolina Medical Association
South Dakota State Medical Association
Tennessee Medical Association
Texas Medical Association
Utah Medical Association
Vermont Medical Society
Washington State Medical Association
West Virginia State Medical Association
Wisconsin Medical Society
Wyoming Medical Society

State and Local Specialty Societies
Alabama Society of Otolaryngology—Head and Neck Surgery
Arizona Academy of Otolaryngology—Head and Neck Surgery Society
Arkansas Society of Otolaryngology—Head and Neck Surgery
Buffalo Otolaryngology Society
California Head and Neck Specialists
California Otolaryngology Society
Chicago Laryngological and Otologic Society
Cincinnati ENT Society
Colorado Ear Nose and Throat Society
Connecticut State ENT Society
Delaware Academy of Otolaryngology—Head and Neck Surgery
East Tennessee Ear, Nose, and Throat Society
Florida Society of Facial Plastic and Reconstructive Surgery
Florida Society of Otolaryngology—Head and Neck Surgery
Georgia Society of Otolaryngology—Head and Neck Surgery
Greater Miami Otolaryngology Association
Houston Society of Otolaryngology—Head and Neck Surgery
Indiana Academy of Otolaryngology—Head and Neck Surgery
Iowa Academy of Otolaryngology—Head and Neck Surgery
Long Island Society of Otolaryngology—Head and Neck Surgery
Louisiana Academy of Otolaryngology—Head and Neck Surgery
Maryland Society of Otolaryngology
Massachusetts Society of Otolaryngology—Head and Neck Surgery
Metro Atlanta Educational Society for Otolaryngology—Head and Neck Surgery
Michigan Otolaryngological Society
Minnesota Academy of Otolaryngology—Head and Neck Surgery
Mississippi Society of Otolaryngology, Head and Neck Surgery
Nebraska Academy of Otolaryngology—Head and Neck Surgery
New Hampshire Society of Otolaryngology—Head and Neck Surgery
New Mexico Society of Otolaryngology
New York Laryngological Society
New York Otologic Society
New York State Society of Otolaryngology—Head and Neck Surgery
North Carolina Society of Otolaryngology—Head and Neck Surgery
North Florida Sinus Center
Northeastern Ohio Otolaryngology- Head and Neck Surgery Society
Northwest Academy of Otolaryngology—Head and Neck Surgery
Oklahoma Academy of Otolaryngology—Head and Neck Surgery
Orange County Society of Otolaryngology—Head and Neck Surgery
Oregon Academy of Otolaryngology/Head and Neck Surgery
Pennsylvania Academy of Ophthalmology
Pennsylvania Academy of Otolaryngology—Head and Neck Surgery
Pennsylvania Psychiatric Society
Puerto Rico Society of Otolaryngology—Head and Neck Surgery
San Diego Academy of Otolaryngology
San Francisco Bay Area ENT Society
Santa Barbara Society of Otolaryngology
South Carolina Society of Otolaryngology—Head and Neck Surgery
Texas Association of Otolaryngology
Tidewater Otolaryngology Society
Utah Society of Otolaryngology
Vermont Otolaryngology Society
Virginia Society of Otolaryngology—Head and Neck Surgery
Washington Metropolitan Otolaryngology—Head and Neck Society
Wisconsin Society of Otolaryngology—Head and Neck Surgery