

May 18, 2018

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

The Honorable Ron Wyden  
Ranking Member, Senate Finance Committee  
U.S. Senate  
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](mailto: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