

July 7, 2015

The Honorable John Boehner
Speaker of the House
U.S. House of Representatives
Washington, DC 20515

The Honorable Nancy Pelosi
Democratic Leader
U.S. House of Representatives
Washington, DC 20515

Dear Speaker Boehner and Leader Pelosi:

On May 21, legislation (H.R. 2519) was reintroduced to inappropriately provide audiologists with 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 H.R. 2519.**

Many in the audiology community have long sought, with no success, the removal of physician referral requirements that would provide them with “direct access” to patients in the Medicare program. H.R. 2519 builds upon this concept of independence by also seeking a “limited license physician” status for audiologists.

Given the expansion of healthcare-related nomenclature, audiologists and many other non-physician providers with doctoral degrees can now call themselves “doctor.” Audiologists are not physicians and should not be considered as such under the Medicare program. 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.

Bypassing a physician evaluation and referral can lead to a misdiagnosis and inappropriate treatment that could cause lasting, and expensive, harm to patients. The Centers for Medicare and Medicaid Services (CMS) declared that referrals from physicians are the “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”

As a legislator, 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.

For the health and well-being of America’s seniors, we respectfully urge you to oppose any efforts to advance this misguided legislation. Thank you for your consideration, and please contact the American Academy of Otolaryngology—Head and Neck Surgery at legfederal@entnet.org with any questions.

Sincerely,

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 Rheumatology
American College of Surgeons
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 Breast Surgeons
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
Society for Cardiovascular Angiography and Interventions
Society of University Otolaryngologists

State and Local Medical Associations

Arizona Medical Association
Arkansas Medical Society
California Medical Association
Colorado Medical Society
Connecticut State Medical Society
Idaho Medical Association
Illinois State Medical Society
Indiana State Medical Association
Kansas Medical Society
Louisiana State Medical Society
Maine Medical Association
Massachusetts Medical Society
MedChi, the Maryland State Medical Society
Medical Association of Georgia
Medical Society of D.C.
Medical Society of Delaware
Medical Society of New Jersey
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
Nevada State 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
Rhode Island Medical Society
South Dakota State Medical Association
Tennessee Medical Association
Texas Medical Association
Utah Medical Association
West Virginia State Medical Association
Wisconsin Medical Society

State and Local Specialty Societies

Alabama Society of Otolaryngology
Arizona Society of Otolaryngology—Head and Neck Surgery
Arkansas Society of Otolaryngology
Buffalo Otolaryngology Society
California Otolaryngology Society
Central Indiana Otolaryngology Society
Charlotte Eye, Ear, Nose, and Throat Associates
Cincinnati ENT Society
Colorado Ear, Nose, and Throat Society
Connecticut State ENT Society
Dallas Society of Otolaryngology
Delaware Academy of Otolaryngology—Head and Neck Surgery
East Tennessee Otolaryngology Society
Florida Society of Facial Plastic & Reconstructive Surgery
Florida Society of Otolaryngology—Head and Neck Surgery
Georgia Society of Otolaryngology—Head & Neck Surgery
Greater Miami Otolaryngology Association
Hawaii Society of Otolaryngology—Head and Neck Surgery
Indiana Academy of Otolaryngology—Head and Neck Surgery
Iowa Academy of Otolaryngology—Head and Neck Surgery
Kansas Society of Otolaryngology—Head and Neck Surgery
Kentucky Society 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—Head and Neck Surgery
Massachusetts Society of Otolaryngology—Head and Neck Surgery
Metro Atlanta Otolaryngology Head and Neck Society
Michigan Otolaryngological Society
Minnesota Academy of Otolaryngology—Head and Neck Surgery
Mississippi Society of Otolaryngology—Head and Neck Surgery
Missouri Society of Otolaryngology—Head and Neck Surgery
Montana Society of Otolaryngology—Head and Neck Surgery

Nebraska Academy of Otolaryngology—Head and Neck Surgery
New Hampshire Academy of Family Physicians
New Jersey Academy of Otolaryngology—Head and Neck Surgery
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
Northeastern Ohio Society of Otolaryngology—Head and Neck Surgery
Oklahoma Academy of Otolaryngology—Head and Neck Surgery
Oregon Academy of Otolaryngology—Head and Neck Surgery
Pennsylvania Academy of Otolaryngology—Head and Neck Surgery
Rhode Island Society of Otolaryngology—Head and Neck Surgery
San Diego Academy of Otolaryngology—Head and Neck Surgery
South Carolina Society of Otolaryngology—Head and Neck Surgery
South Dakota Academy of Otolaryngology—Head and Neck Surgery
Texas Association of Otolaryngology Head and Neck Surgery
The Wichita Ear Clinic
Vermont Otolaryngology Society
Virginia Society of Otolaryngology—Head and Neck Surgery
Washington Metropolitan Otolaryngology Head and Neck Society
West Virginia Academy of Otolaryngology—Head and Neck Surgery
Wisconsin Society of Otolaryngology—Head and Neck Surgery

Cc: U.S. House of Representatives