

August 1, 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:

On behalf of the undersigned organizations, representing medical imaging providers and manufacturers, we appreciate previous legislative action to address scheduled cuts created by changes within the Medicare Physician Fee Schedule (MPFS). The provisions included in the “Protecting Medicare and American Farmers from Sequester Cuts Act” that provided a 3 percent positive adjustment to the conversion factor to partially offset a payment reduction in the MPFS and an additional 4 percent Medicare payment reduction due to pay-as-you-go (PAYGO) statutory requirements were critical to increase financial stability and allow Medicare clinicians to continue operation.

We write now to express our deep concerns with the reductions contained in the 2023 Medicare Physician Fee Schedule proposed rule, which, when coupled with the expiration of previous Congressional interventions, would result in double-digit cuts for providers in 2023. The Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) was enacted to maintain the stability of our health care infrastructure in order to ensure access to vital health services, but now the perennial fight to avoid catastrophic damage to clinicians’ ability to provide care has returned. An approximately 4.5% cut to the conversion factor, in addition to the outstanding threat of the 4% PAYGO reduction and end of the 2 percent sequestration moratorium in 2022 further jeopardizes the financial stability and operations of Medicare providers.

After enduring a global pandemic, where many providers were forced to cease operations due to restrictions on elective procedures, a subsequent supply chain crisis, and the steep increased cost of nearly all aspects of maintaining operations, significant headwinds facing health care providers across the country still remain. The latest MPFS proposed rule cuts only will make matters worse and threaten access to life-saving procedures and continued operation of essential services.

Advocacy groups are already aligning and calling on policy makers to address these immediate cuts and look for more permanent solutions, like repealing budget neutrality and tying reimbursement to inflation.

We urge Congress to provide necessary relief before the end of the year to ensure stability for the health care delivery system until these permanent solutions are enacted. Failure to prevent these cuts will strain our health care system and jeopardize patient access to medically necessary services. We count on your careful consideration of our request.

Sincerely,

American College of Radiology (ACR)

American Society of Radiologic Technologists (ASRT)

The Association for Medical Imaging Management (AHRA)

Medical Imaging & Technology Alliance (MITA)

Radiology Business Management Association (RBMA)

Rayus Radiology

Shields Healthcare Group

Society of Nuclear Medicine and Molecular Imaging (SNMMI)