

April 9, 2020

The Honorable Steven Mnuchin  
Secretary  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

The Honorable Alex Azar  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

The Honorable Jovita Carranza  
Administrator  
U.S. Small Business Administration  
U.S. Sm 109 3rd Street, SW  
Washington, DC 20416

Dear Secretary Mnuchin, Azar and Administrator Carranza:

On behalf of the undersigned osteopathic specialty and state organizations, and the more than 151,000 osteopathic physicians and medical students we represent, thank you for the steps you have taken and will continue to take in order to protect Americans during this war against the Novel Coronavirus (COVID-19) outbreak. During this unprecedented time, Osteopathic physicians (DOs) have remained steadfast in delivering healthcare on the frontlines in order to treat and care for patients across primary care, emergency medicine, and all medical specialty settings in every state in America.

In addition to the obvious health risks associated with COVID-19, physicians across the country are also in financial distress. They are postponing of certain elective procedures and office visits, have a significant increase in costs associated with acquiring the personal protective equipment (PPE) necessary for preventing the spread of COVID-19, and now need immediate financial assistance. Physicians are working to ensure that their patients do not experience any disruptions in their care, especially those with chronic conditions and urgent needs, while also incurring significant financial losses stemming from the COVID-19 pandemic. As you develop guidance for the distribution of resources appropriated through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), we urge you to consider mechanisms for distribution that ensure our country has a robust physician workforce that is ready to care for patients throughout the pandemic and when this public health emergency is over.

DOs play a critical role in increasing access to health care in our country, including rural and underserved urban areas. While DOs make up twelve percent of all physicians in the United States, they comprise 40 percent of the physicians practicing in medically underserved areas, and they need your help.

For example, we are aware of hospital-based physicians who are being furloughed without pay due to lower financial revenues of the institution. We are also hearing from physicians in small private practices across the country in rural, suburban, and urban areas who are experiencing financial hardship. As a result of COVID-19, patients are postponing certain medical services and physicians are cancelling non-urgent procedures in order to preserve medical supplies for treating patients with COVID-19 and to slow the

spread of the virus. Small private practices are often the only access point to care in many communities, and they are at risk of shutting down.

We are requesting immediate relief to ensure patients have access to physicians throughout the country now and after the pandemic. Our organizations are grateful to Congress for recognizing the needs of healthcare providers in the CARES Act and appropriating \$100 billion to the Assistant Secretary for Preparedness and Response to provide grants through the Public Health and Social Services Emergency Fund (PHSSEF) to hospitals as well as Medicare and Medicaid enrolled providers to cover unreimbursed health care related expenses or lost revenues attributable to the public health emergency resulting from the COVID-19. As you are likely aware, Congress' intent is for these funds to be used to respond to immediate needs.

As you begin to develop mechanisms for distributing these funds, we ask for the following policies to be incorporated with this funding:

We urge HHS to implement protections similar to those in the Paycheck Protection Program, managed by the Small Business Administration, and require that hospitals and other institutional employers maintain physician positions and salary levels at least at the same level they were in the October-December 2019 period as a condition of receiving funds. This requirement should also be inclusive of physicians contracted with hospitals, either directly or through a physician group.

Additionally, while we recognize the importance of providing hospitals and other institutional health care providers with funding to cover unreimbursed health care expenses, it is important that funding be provided to physicians enrolled in Medicare and Medicaid either through the PHSSEF or an alternate mechanism. As a direct result of the COVID-19 outbreak, many physicians are seeing a significant decrease in office visits and are struggling to cover practice expenses. The CARES Act permits the HHS Secretary to provide funding through a grant or other mechanism and we urge HHS to provide immediate financial relief by issuing funds through Medicare Administrative Contractors (MACs) or any other efficient mechanism for distribution. Utilization of the MACs would be efficient and would also allow for oversight as funding would be based on Medicare claims data and utilize existing enrollment and payment protocols.

Our organizations appreciate the work involved in implementing the CARES Act in as short a timeframe as possible and we stand ready to work with you and stand ready to be a resource to you during this challenging time so that all American have access to the highest-quality of care, in order to ultimately win the war against COVID-19.

Sincerely,

American Osteopathic Association  
American Academy of Osteopathy  
American College of Osteopathic Emergency Physicians  
American College of Osteopathic Family Physicians

American College of Osteopathic Internists  
American College of Osteopathic Neurologists and Psychiatrists  
American College of Osteopathic Obstetricians and Gynecologists  
American College of Osteopathic Pediatricians  
American College of Osteopathic Surgeons  
American Osteopathic Academy of Addiction Medicine  
American Osteopathic Academy of Orthopedics  
American Osteopathic Academy of Sports Medicine  
American Osteopathic Association of Prolotherapy Regenerative Medicine  
American Osteopathic College of Dermatology  
American Osteopathic College of Occupational and Preventive Medicine  
American Osteopathic College of Radiology  
American Osteopathic Colleges of Ophthalmology and Otolaryngology -- Head Neck Surgery  
American Osteopathic Society of Rheumatic Diseases  
American Osteopathic College of Proctology  
Arizona Osteopathic Medical Association  
Arkansas Osteopathic Medical Association  
Colorado Society of Osteopathic Medicine  
Florida Osteopathic Medical Association  
Georgia Osteopathic Medical Association  
Idaho Osteopathic Physicians Association  
Indiana Osteopathic Association  
Iowa Osteopathic Medical Association  
Kansas Association of Osteopathic Medicine  
Kentucky Osteopathic Medical Association  
Louisiana Osteopathic Medical Association  
Maine Osteopathic Association  
Maryland Association of Osteopathic Physicians  
Michigan Osteopathic Association  
Michigan Osteopathic Association  
Mississippi Osteopathic Medical Association  
Missouri Association of Osteopathic Physicians & Surgeons  
NC Society of the American College of Osteopathic Family Physicians  
New Hampshire Osteopathic Association  
New Jersey Association of Osteopathic Physicians and Surgeons  
New Mexico Osteopathic Medical Association  
New York State Osteopathic Medical Society  
North Carolina Osteopathic Medical Association  
Ohio Osteopathic Association  
Osteopathic Physicians & Surgeons of California  
Osteopathic Physicians and Surgeons of Oregon  
Pennsylvania Osteopathic Medical Association  
Rhode Island Society of Osteopathic Physicians  
South Carolina Osteopathic Medical Society

Student Osteopathic Medical Association  
Tennessee Osteopathic Medical Association  
Texas Osteopathic Medical Association  
Virginia Osteopathic Medical Association  
Washington State Osteopathic Medical Association  
Wisconsin Association of Osteopathic Physicians & Surgeons