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March 20, 2023

The Honorable Bernie Sanders
Chairman,
Senate HELP Committee
428 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bill Cassidy, MD
Ranking Member,
Senate HELP Committee
428 Dirksen Senate Office Building
Washington, DC 20510

Submitted electronically to HealthWorkforceComments@help.senate.gov

RE: Health Care Workforce Shortages RFI

Dear Chairman Sanders and Ranking Member Cassidy,

Thank you for examining the challenges faced by physicians and other healthcare professionals as the Senate Health, Education, Labor and Pensions (HELP) Committee develops legislation to address workforce shortages. As you may be aware, the current shortage of rheumatologists is a major issue affecting patients with rheumatic diseases, which can cause significant morbidity and mortality if left untreated.

The Coalition of State Rheumatology Organizations (CSRO) is comprised of over 40 state and regional professional rheumatology societies whose mission is to advocate for excellence in the field of rheumatology, ensuring access to the highest quality of care for the management of rheumatologic and musculoskeletal disease. Our coalition serves practicing rheumatologists and their patients.

In addition to supporting policies to directly address workforce shortages such as **establishing a loan repayment program targeting specialty physicians serving in rural and underserved areas** and address overall **reimbursement**, we are concerned that insurers and pharmacy benefit managers (PBMs) have usurped the shared decision making between the physician and the patient to determine the best of care for our patients.

In our specialty, rheumatology, patients have chronic autoimmune conditions that are often lifelong in nature. The health insurance industry has gradually inserted itself into the doctor-patient relationship, not only taking over treatment decisions but also eroding the trust that we have built up with our patients over the years. We have seen PBMs determine not only what medications our patients can have, but also when they can get them, and how much they will pay for them.

In addition to directly curtailing our ability to take care of our patients, these multi-billion dollar companies have added layers of administrative burden on physicians with frivolous prior authorizations requiring documentation as long as 30 pages, appeals processes that are drawn out and determined by clerical staff or at best retired physicians in completely different specialties. All of this contributes to the moral injury and burn out that results in many physicians, including rheumatologists, choosing early retirement, exacerbating an already shrinking workforce.

As you explore solutions to address workforce shortages, we urge you to consider the part that health insurance companies/PBMs play in these ever growing shortages. Reducing the administrative burdens to allow rheumatologists to spend more time with patients will

improve the health and wellbeing of both the patient and the physician. Even more important will be to address the egregious utilization management tools such as step therapy and non-medical switching that has interfered with the doctor-patient relationship and has clearly been shown to harm patients and increase downstream costs to the patient and the system.

To support rheumatologists in addressing these challenges, CSRO started a [Reporting Insurance/Payer Issues page](#) where rheumatologists can describe issues or complaints they have with payers regarding patient care. The responses we've received so far always have a sense of urgency and frustration in the description of whatever obstacle to care is being thrown up by an insurance company or PBM. These policies harm patients and impede rheumatologists' ability to sustain their practices.

We believe that the shortage of rheumatologists is a critical issue that requires immediate attention, and we appreciate that you are focused on addressing healthcare workforce shortages. Thank you for considering our comments. We look forward to working with you to ensure that patients with rheumatic diseases receive the care they need. Please do not hesitate to contact us at info@csro.info should you require additional information.

Sincerely,

A handwritten signature in black ink that reads "Madelaine Feldman". The signature is fluid and cursive, with the first name "Madelaine" written in a larger, more prominent script than the last name "Feldman".

Madelaine Feldman, MD FACR
Vice President-Advocacy and Government Affairs
Coalition of State Rheumatology Organizations