

[DATE]

[DRAFT]

Andy Slavitt  
Acting Administrator  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Acting Administrator Slavitt,

The undersigned organizations write you today to express our interest in ensuring optimal and high quality electrodiagnostic (EDX) medical care is delivered to all patients. We are concerned that deep cuts in the reimbursement rates to needle electromyography (EMG) and nerve conduction studies (NCS) did little to reduce the fraud and abuse driving increased utilization and may further harm patient access by straining qualified healthcare providers operating in this important space. We encourage the Centers for Medicare and Medicaid Services (CMS) to protect patient health by working with the stakeholder community in a meaningful way to collaboratively pursue efforts which ultimately ensure that patients receive EMG and NCS testing only from healthcare providers that can meet objective quality standards. In this regard, we offer ourselves as a resource and hope to establish a working relationship with CMS.

For serious and progressive conditions such as ALS, muscular dystrophies, and various neuropathies, an early and accurate diagnosis through EDX testing is essential to ensure timely patient access to life-sustaining or life-improving therapy. The proliferation of poor-quality and incomplete EDX testing by bad actors that often operate with little overhead and thus feel less impact from recent reimbursement cuts undermines the chance that medically necessary EDX procedures will be performed early in the disease state or that the number of studies performed will be extensive enough to diagnose complex diseases. Moreover, for common conditions including carpal tunnel syndrome, cervical and lumbosacral radiculopathies, and ulnar neuropathies, performing the right EDX study at the right time avoids missed or inaccurate diagnoses and allows the correct treatment to occur sooner, saving healthcare dollars and decreasing patients' pain and suffering. The fact that sub-optimal, improper, and incomplete EDX studies continue to be reimbursed by CMS represents a noticeable loss of critical healthcare dollars. We hope to work with you and your colleagues to define quality standards and pursue additional opportunities to effectively reduce fraud and abuse.

Representative organizations met with CMS staff recently for an initial conversation on this issues, and the community was encouraged by the discussion that occurred at that time. Moving forward, we would like to more formally and regularly engage with CMS to ensure constructive progress continues to be made. In this regard, we hope to have a community stakeholder call with your office to receive an update on this issue and identify opportunities that we can support and assist CMS with advancing. To coordinate a call, please contact Dane Christiansen of the Health and Medicine Counsel of Washington at [christiansen@hmcw.org](mailto:christiansen@hmcw.org) or (202) 544-7499.

Thank you for your time and your consideration of our request.

Sincerely,