

November 13, 2025

VIA ELECTRONIC TRANSMISSION

The Honorable Tom Cole
Chair
Committee on Appropriations
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Rosa DeLauro
Ranking Member
Committee on Appropriations
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Cole and Ranking Member DeLauro:

On behalf of the undersigned physician organizations, which are committed to delivering high-quality, evidence-based care to Medicare beneficiaries, **we write to commend you and your colleagues on the House Appropriations Committee for unanimously adopting an amendment that would halt funding for implementation of the Medicare Wasteful and Inappropriate Service Reduction (WISeR) Model in the Fiscal Year 2026 appropriations legislation.**¹

This action appropriately pauses the rollout of WISeR, creating necessary time to address fundamental concerns with the model's design and implementation. Physicians have long faced challenges with prior authorization in Medicare Advantage, including delayed care, administrative burden, and adverse impacts on patient outcomes. Introducing prior authorization into Medicare Fee-for-Service demands careful planning and robust safeguards to prevent repeating these well-documented problems. Moreover, physician organizations and other frontline stakeholders were not engaged during the development of this model, despite being directly impacted by its requirements.

We urge the Committee to continue working with key stakeholders – including physician organizations, patient advocates, and CMS – to ensure that any adoption of WISeR is thoughtful, equitable, and minimally disruptive to clinical practice. We especially appreciate the Committee's recognition that physician organizations, despite being directly impacted, were not brought to the table during the model's development. By prioritizing stakeholder engagement and methodical review, the Committee is setting an important precedent for how Centers for Medicare and Medicaid Innovation (CMMI) should approach complex payment reforms to avoid repeating the missteps of prior authorization in Medicare Advantage.

¹ U.S. House of Representatives, Committee on Appropriations. (2025, September 9), *Amendment #5 offered by Rep. Lois Frankel to the FY 2026 Departments of Labor, Health and Human Services, Education, and Related Agencies Appropriations Act* (p. 30), <https://docs.house.gov/meetings/AP/AP00/20250909/118593/HMKP-119-AP00-20250909-SD003.pdf>.

Building on the detailed recommendations physician organizations submitted to CMS, **we respectfully urge the Committee to consider the following priorities**^{2, 3}:

- **Delay Implementation:** Postpone the WISeR Model until at least January 1, 2027, contingent on CMMI incorporating physician and stakeholder input to address identified concerns, conducting full operational analysis, and ensuring system readiness before launch date.
- **Assess Overlapping Burden:** Evaluate the cumulative administrative impact of WISeR in conjunction with other new and existing programs (e.g., the Transforming Episode Accountability Model (TEAM), and the Ambulatory Specialty Model (ASM), Hospital Outpatient Department Prior Authorization (OPD PA) program to prevent duplication, conflicting workflows, and added complexity for physicians and patients.
- **Establish Strong Guardrails:** Guarantee that approved prior authorization determinations under WISeR constitute binding payment, prohibit retroactive denials, and hold vendors accountable through audits and penalties for excessive denials, and independent oversight.
- **Require Gold Carding and Exemptions:** Implement robust gold-carding programs to exempt consistently compliant physicians. The programs should have transparent performance criteria and fair opportunities for exemption from the outset.
- **Enhance Transparency and Standards:** Require vendors to disclose the evidence-based criteria, algorithms, and AI/ML tools used to make determinations, ensure that clinical judgment is not overridden by automation, and protect patients through independent validation and public reporting.
- **Reform Vendor Payment:** Eliminate profit-maximizing and denial-based payment incentives by prohibiting shared-savings arrangements that reward denials; instead, adopt fixed-fee or balanced payment structures that do not undermine patient access.

² American Society of Anesthesiologists, (2025, July 16), ASA Joins Coalition Expressing Concerns with WISeR Model. <https://www.asahq.org/advocacy-and-asapac/fda-and-washington-alerts/washington-alerts/2025/07/asa-joins-coalition-expressing-concerns-with-wiser-model>.

³ American Medical Association, 2025, letter to Sutton re: WISeR Model v2 (July 16, 2025), <https://searchlf.ama-assn.org/letter/documentDownload?uri=/unstructured/binary/letter/LETTERS/lfcts.zip/2025-7-16-Letter-to-Sutton-re-WISer-Model-v2.pdf>.

We are committed to supporting Medicare's integrity while ensuring access to medically necessary care. We appreciate your bipartisanship and decisive action and look forward to continued collaboration to improve care value without compromising patient outcomes.

Thank you for your leadership.

American Society of Anesthesiologists
American Association of Neurological Surgeons
Congress of Neurological Surgeons
American Academy of Orthopaedic Surgeons
American College of Surgeons
Alliance of Specialty Medicine
American Academy of Neurology
American Academy of Ophthalmology
American Academy of Otolaryngology - Head and Neck Surgery
American Academy of Physical Medicine and Rehabilitation
American Association of Neuromuscular and Electrodiagnostic Medicine
American College of Cardiology
American College of Mohs Surgery
American Gastroenterological Association
American Orthopaedic Foot & Ankle Society
American Osteopathic Association
American Society for Dermatologic Surgery Association
American Society for Gastrointestinal Endoscopy
American Society for Surgery of the Hand Professional Organization
American Society of Cataract and Refractive Surgery
American Society of Colon & Rectal Surgeons
American Society of Nuclear Cardiology
American Society of Regional Anesthesia and Pain Medicine
American Urogynecologic Society
College of American Pathologists
Medical Group Management Association
National Association of Spine Specialists
North American Neuromodulation Society
Society for Cardiovascular Angiography and Interventions
Society for Vascular Surgery
Society of Gynecologic Oncology
Society of Interventional Radiology
Society of Thoracic Surgeons

The Honorable Tom Cole
The Honorable Rosa DeLauro
Page 4 of 4

Cc:

The Honorable Robert Aderholt
The Honorable Lois Frankel
The Honorable Andy Harris, M.D.