

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.**<sup>1</sup>

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.

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<sup>1</sup> 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**<sup>2, 3</sup>:

- **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.

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<sup>2</sup> 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>.

<sup>3</sup> 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

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Cc:

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