December 5, 2019

The Honorable Mitch McConnell Majority Leader United States Senate

The Honorable Nancy Pelosi Speaker of the House United States House of Representatives The Honorable Chuck Schumer Minority Leader United States Senate

The Honorable Kevin McCarthy Minority Leader United States House of Representatives

Dear Leader McConnell, Leader Schumer, Speaker Pelosi, and Leader McCarthy:

As Congress continues its efforts to protect patients from surprise medical bills, we hope that you recognize the potentially devastating unintended consequences that certain proposals under consideration could have on smaller and independent physician practices such as ours, and urge you to ensure a thoughtful approach as the various proposals are brought together.

Smaller and independent physician practices provide health care to thousands of communities across our country, often serving as the only means of access in rural and underserved areas. As such, we see first-hand the impact surprise billing can have on our patients, and therefore strongly share your commitment to taking patients out of the middle of billing disputes that can arise when insurers do not contract with physicians. However, we are also very concerned that the wrong solution to surprise billing will severely impact small practices by eliminating what few incentives remain for insurers to negotiate fairly with us, therefore driving further consolidation within health care, and triggering ensuing cost increases.

Our nearly nine hundred groups are smaller and independent practices of many specialties that provide care for millions of patients each year in small rural communities and large urban centers alike. As small and independent businesses, we also play a vital role in the economy of our nation and the communities in which we operate, providing thousands of jobs and local economic stability. Further, just like many other small and independent businesses regardless of sector, we face challenges such as providing benefits for our employees, meeting overhead costs, and overall ensuring our longevity.

We have worked relentlessly to secure in-network contracts with as many of our local plans as we can. However, smaller physician groups are particularly disadvantaged when it comes to contracting with health plans. This is an issue that is being further aggravated as insurance companies consolidate, leaving only a single insurer to dominate the market in a number of states. Therefore, insurers at best offer us only drastically undervalued "take-it-or-leave-it" contracts that will not even cover the costs of our overhead—while others ignore altogether our inquiries to be part of health plan networks. The wrong approach to addressing surprise bills will only further empower insurers to weaken our practices.

Therefore, we urge that any federal solution to surprise billing must include a reasonable initial payment. Any mechanism that ties out-of-network payment to a median in-network benchmark will allow insurers to forego entirely contracting with physicians because they will have access to a discounted contract rate (the median in-network) *without* needing to provide us with any corresponding benefits of contracting in exchange. Without any real enforceable network adequacy protections for federally-regulated plans, insurance networks will only continue to narrow, preventing patients in many areas from being able to access care at all, especially in rural and underserved communities. As a result, we strongly urge you to ensure that any surprise billing legislation that comes to the floor includes a strong <u>accessible</u>, <u>timely</u>, <u>and efficient</u> independent dispute resolution (IDR) mechanism. Based on successful state models, it is clear such an approach when used federally can eliminate surprise bills, reduce health care costs, and ensure fair and equitable contracting dynamics between insurers and physicians without adding undue burdens or costs to taxpayers.

To be accessible to small physician practices, this IDR mechanism should not be restricted to claims above a qualifying dollar amount as some proposals in Congress have sought to do. Recent informal estimates calculated by the Congressional Budget Office (CBO) have demonstrated that eliminating or at least significantly reducing a qualifying threshold for IDR would have little to no impact on scoring at all. Even if a so-called "batching" mechanism is added to allow similar claims to be grouped together to reach a dollar threshold, many of us lack the necessary patient volume to even reach that level. Moreover, there is a significant range across our specialties in the dollar amounts of a typical claim, spanning from under a hundred dollars to thousands, further complicating any effort to develop a "one-size-fits-all" threshold.

Again, we strongly urge you to consider how these federal policies currently under consideration may disproportionally impact small physician groups and the care we provide to your constituents. We are deeply concerned that the wrong approach will ultimately drive many of us out of the market entirely, which will drive up health care costs as more smaller practices will be purchased by hospital systems and others, leading to increased consolidation. Studies have shown that if this consolidation happens, health care costs could increase by as much as 30 percent<sup>1</sup>. We firmly believe, therefore, that an appropriate policy must be crafted that keeps costs contained, preserves access to care for patients, and will not disrupt contracting dynamics between physicians and insurers who attempt to negotiate in good faith.

We appreciate the opportunity to share our concerns, and thank you once again for your efforts to protect patients.

Sincerely,

Anesthesia Associates of East Alabama	Opelika, Alabama
Auburn Dermatology and Skin Cancer Center	Auburn, Alabama
Bessemer Emergency Physicians	Birmingham, Alabama
Bolling Plastic Surgery	Fayette, Alabama
Brookwood Dermatology	Vestavia, Alabama
Dermatology Associates of Dothan	Dothan, Alabama
Dermatology Center South	Dothan, Alabama
Dermatology of North Alabama	Guntersville, Alabama
DermLab	Birmingham, Alabama
General Surgery Associates	Huntsville, Alabama

<sup>&</sup>lt;sup>1</sup> Examining the Impact of Health Care Consolidation; Martin Gaynor, E.J. Barone University Professor of Economics and Health Policy, Heinz College at Carnegie Mellon University, February 14, 2018.

Heights Dermatology & Aesthetics Herron Dermatology and Laser Martin Plastic and Reconstructive Surgery Mobile Dermatology, PC Nash Dermatology Princeton Surgical Specialists, PC Pure Dermatology Sharon Foster Gardepe, MD, PC Shelby Dermatology, PC Skin Wellness Dermatology Skin Wellness Dermatology Southern Institute of Plastic Surgery Springhill Emergency Physicians, PC Surgical Dermatology Group Turnham Nelson Dermatology Juneau Emergency Medical Associates Southeast Medical Clinic **Barrow Brain and Spine Desert Plastic Surgery** Grandview Surgical Associates, PC Neurosurgical Associates, LTD Phoenix Pathologists, Ltd. Advanced Plastic Surgery Arizona Associated Surgeons

Dennis E. Weiland, MD, PC Desert Ridge Allergy Associates James Callison Pathology Southwest Emergency Physicians Summit Anesthesia Services, PLLC Valley Anesthesiology Associates Scott Ferguson, MD Radiology

Birmingham, Alabama Montgomery, Alabama Dothan, Alabama Mobile, Alabama Auburn, Alabama Birmingham, Alabama Hoover, Alabama Huntsville, Alabama Birmingham, Alabama Homewood, Alabama Homewood, Alabama Dothan, Alabama Mobile, Alabama Birmingham, Alabama Dothan, Alabama Juneau, Alaska Juneau, Alaska Phoenix, Arizona Scottsdale, Arizona Sun City West, Arizona Phoenix, Arizona Phoenix, Arizona Arizona Greater Metro Area Phoenix, Arizona Scottsdale, Arizona Phoenix, Arizona Phoenix, Arizona Yuma, Arizona Phoenix, Arizona Phoenix, Arizona West Memphis, Arkansas

Ace Anesthesia Group, Inc Achieve Brain & Spine, Institute of Neurological Surgery Anesthesia Associates of Chico Anesthesiology Consultants of Marin, Inc. Antelope Valley Emergency Medical Associates Berkeley Emergency Medical Group, Inc. Burbank Emergency Medical Group, Inc California Neurosurgical Institute California Pacific Pathology Medical Group CCEP Center for Rheumatology Centers for Family Health Central Coast Emergency Physicians, Inc. Columbia Emergency Medical Group, Inc. Contra Costa Pathology Associates Cosmeticare David D. Hopp, M.D. Douglas Sunde, M.D. Elan Clinic, Plastic Surgery and MedSpa Emergency Medical Management Associates, Inc. **Emergency Specialists Physicians Medical Associates Encinitas Surgical Associates ESPMA** Expert Dermatology Fountain Valley Emergency Physicians GAEP IEMG Independent Emergency Physicians Consortium **Kaiser Permanente** LewMedical Long Beach Emergency Medical Group **LREP Medical Group** 

Hollister, California Santa Monica, California Chico, California Greenbrae, California Lancaster, California Oakland, California Burbank, California Los Angeles, California San Francisco, California Templeton, California Los Angeles, California Ventura, California San Luis Obispo, California Long Beach, California Walnut Creek, California Corona Del Mar, California Beverly Hills, California Monterey, California Grass Valley, California Arcadia, California Torrance, California California Los Angeles, California West Hills, California Fountain Valley, California Glendale, California Whittier, California San Diego, California San Francisco, California Glendale, California Los Angeles, California Thousand Oaks, California

Mark L. Labowe, M.D. Meister Eye & LASER Center Monterey Anesthesia Professionals Monterey Bay Emergency Physicians Mountain View Emergency Physicians Medical Group Napa Valley Emergency Medical Group NeuroSpine Institute Neurosurgical Medical Clinic, Inc Newport Dermatology Associates Newport Irvine Surgical Specialists, APC North County Surgical Associates Ophthalmology Associates of the Valley Pacific Emergency Providers, APC Pacific Eye Care Center Pacific Heights Plastic Surgery Palos Verdes Plastic Surgery Medical Center, Inc. Phillip Kissel, MD APC Placentia Linda Emergency Physicians Plastic Surgery Associates of Orange County Randolph S. Lawrence, MD, FACS Sacred Heart Medical Group San Francisco Plastic Surgery - Dr. Karen M. Horton Sayah Institute Shorr, Smith, and Hurst MDs SkinSafe Dermatology South Coast Emergency Medical Group Southern California center for anti aging Southern California Neurosurgical Associates Southern California Orthopedic Institute Surgical Economic Think Tank Suzanne A. Trott, MD, Inc **SVEMG** 

Los Angeles, California Sacramento, California Salinas, California Monterey, California Upland, California Napa, California Palmdale, California San Diego, California Newport Beach, California Newport Beach, California Escondido, California Encino, California San Diego, California Walnut Creek, California San Francisco, California Torrance, California San Luis Obispo, California Placentia, California Mission Viejo, California Templeton, California Riverside, California San Francisco, California Beverly Hills, California Inglewood Calif, California Beverly Hills, California Santa Barbara, California Torrance, California Pasadena, California Van Nuys, California California Beverly Hills, California Salinas, California

Temecula Valley Neurosurgery	Murrieta, California
The Craniospinal Center of Los Angeles	Santa Monica, California
TMI Pathology Associates	Van Nuys, California
Torrance Emergency Physicians	Torrance, California
Urmen Desai, MD MPH FACS FACS & Desai Plastic Surgery	Beverly Hills, California
Valley Neurosurgery and Neurorestoration Center, A	Bakersfield, California
Medical Corporation	
Ventura Emergency Physicians	Ventura, California
William F. Kivett, MD	Pasadena, California
Boulder Valley Anesthesiology	Colorado
Brighton Community Emergency Physicians, LLC	Brighton, Colorado
Carolynn Francavilla, MD	Lakewood, Colorado
Central Colorado Dermatology PC	Salida, Colorado
Clarity Dermatology, PLLC	Castle Rock, Colorado
Colorado Springs Radiologists	Colorado Springs, Colorado
Colorado Surgery and Critical Care Associates, P.L.L.C	Aurora, Colorado
Colorado West Emergency Physicians	Grand Junction, Colorado
Core Dermatology	Denver, Colorado
Crossroads Dermatology	Longmont, Colorado
CU General Surgery at Highlands Ranch	Highlands Ranch, Colorado
Durango Dermatology & Dermatologic Surgery, PLLC	Durango, Colorado
Emergency Medical Specialists PC	Colorado Springs, Colorado
Foothills Dermatology	Niwot, Colorado
Front Range Center for Brain & Spine Surgery, P.C.	Fort Collins, Colorado
Front Range Dermatology	Greeley, Colorado
Front Range Dermatology Associates	Greeley, Colorado
Grand Mesa Emergency Physicians	Delta, Colorado
Joyce Aycock MD, P.C.	Denver, Colorado
Mattoch Pathology	Fort Collins, Colorado
NeurosurgeryOne, LLC	Littleton, Colorado
Peak Medical Care PLLC	Colorado Springs, Colorado
Physician Anesthesia Services, PC	Golden, Colorado

Radiology Imaging Associates, P.C. Rocky Mountain Dermatology, P.C. SkinCare Colorado Surgical Specialists of Colorado Annette L. Headley, M.D. Dermatology Anya Kishinevsky MD LLC Chang Soo Kim, MD **Coastal Obgyn Connecticut Plastic Surgery Group** Dr. Stanley Foster, Surgeon Fairfield County Pathology Consultants LLC Northeast Emergency Medicine Specialists Sandra Margoles, MD Surgery Integrated Dermatology **Delmarva Skin Specialists Doctors for Emergency Service** Premier Dermatology and Cosmetic Surgery Sussex Emergency Associates ADF Dermatology and Skin Surgical Center Ana Gonzalez, MD Dermatology Atlantic Derm PLLC Atlantic Dermatology, LLC **Brevard Physician Associates Calloway Plastic Surgery Cape Coral Emergency Physicians** Clear Skin Dermatology, P.A. ClearSkin Dermatology Coastal Cosmetic Center **Coastal Dermatology** Cynthia Rogers, MD PA Dermatology & Cutaneous Surgery Institute, P.A. Englewood, Colorado Boulder, Colorado Denver, Colorado Golden, Colorado Mystic, Connecticut Norwalk, Connecticut Stamford, Connecticut Stamford, Connecticut Southport, Connecticut Middlebury, Connecticut Bridgeport, Connecticut Connecticut Greenwich, Connecticut Washington, DC Selbybille, Delaware Wilmington, Delaware Newark, Delaware Lewes, Delaware Port Charlotte, Florida Miami, Florida Delray Beach, Florida Cocoa Beach, Florida Melbourne, Florida Ponte Vedra Beach, Florida Cape Coral, Florida Clearwater, Florida Orlando, Florida Jacksonville, Florida Jacksonville, Florida Port St Lucie, Florida Delray Beach and Wellington, Florida

Dermatology SouthEast	North Florida, Florida
Dermatology Specialists of Naples	Naples, Florida
Diaz Plastic Surgery Specialists	Melbourne, Florida
Dr Megan Jack	Boca Raton, Florida
East Coast Pathology	DeLand, Florida
elis Medical Associates (Formerly Emergency Medical	Tampa, Florida
Associates of Tampa Bay)	
Emergency Medical Specialists of Jacksonville	Jacksonville, Florida
Emergency Medicine Excelis Medical Associates (Formerly	Tampa, Florida
Emergency Medical Associates of Tampa Bay)	
Emergency Medicine Professionals	Daytona Beach, Florida
Emergency Physicians of Central Florida LLP	Orlando, Florida
Emergency Resources Group	Jacksonville, Florida
eSSe Plastic Surgery	Fort Lauderdale, Florida
Excelis medical associates	Tampa, Florida
Excelis Medical Associates (Formerly Emergency Medical	Tampa, Florida
Associates of Tampa Bay)	
ForCare Medical	Tampa, Florida
Gainesville Emergency Medicine Associates	Gainesville, Florida
Gardens Dermatology	Palm Beach Gardens, Florida
George Varkarakis MD PA	Miami, Florida
Hernando County Emergency Physicians	Brooksville, Florida
Holy Cross Emergency Physicians, PA	Fort Lauderdale, Florida
Indian River Pathology, LLC	Port Saint Lucie, Florida
Jackie M Tripp MD	Delray Beach, Florida
Jordan Schwartzberg, MD Dermatology	Boca Raton, Florida
Jupiter Dermatology	Jupiter, Florida
KWB Pathology Associates	Tallahassee, Florida
Lee Memorial physicians	Cape Coral, Florida
Lincoln Road Dermatology	Miami Beach, Florida
Long Dermatology	Ormond Beach, Florida
Manatee True Partners Emergency Specialists	Bradenton, Florida

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Evans Dermatology Finan Templeton Dermatopathology Associates Georgia Dermatology Center Georgia Emergency Department Services Georgia Emergency Physician Specialists Georgia Neurosurgical Institute, PC Georgia Skin Cancer & Aesthetic Dermatology Kavali Plastic Surgery Medical Dermatology Specialists, P.C. Neurological Institute of Savannah Northwest Georgia Dermatology Olansky Dermatology Associates OrthoAtlanta Peachtree Dermatology Associates Peachtree Orthopedics Prima Center for Plastic Surgery Skin Care Physicians of Georgia Southwest Georgia Dermatology, P.C. Summit Radiology Tanner Vascular Surgery Valdosta Anesthesia Associates, P.C. Williams Plastic and Reconstructive Surgery, P.C. Dawson Dermatology Hawai'i Radiological Associates WestSide Surgical Services Ada Dermatology, PA Anesthesia Associates of Boise, P.A. Gem State Derm Idaho Skin Surgery Center, PC Steven E Ozeran MD, PA Alliance Pathology Consultants Bloom Plastic Surgery

Evans, Georgia Atlanta, Georgia Cumming, Georgia Gainesville, Georgia Savannah, Georgia Macon, Georgia Athens, Georgia Atlanta, Georgia Sandy Springs, Georgia Savannah, Georgia Rome, Georgia Atlanta, Georgia Atlanta, Georgia Atlanta, Georgia Atlanta, Georgia Duluth, Georgia Milledgeville, Georgia Albany, Georgia Atlanta, Georgia Carrollton, Georgia Valdosta, Georgia Dalton, Georgia Honolulu, Hawaii Hilo, Hawaii Ewa Beach, Hawaii Boise, Idaho Boise, Idaho Boise, Idaho Boise, Idaho Lewiston, Idaho Elk Grove Village, Illinois Chicago, Illinois

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Dermatology	
Dermatology Physicians Group	Chicago, Illinois
Distinctive Dermatology	Fairview Heights, Illinois
DuPage Emergency Physicians	Downers Grove, Illinois
DuPage Pathology Associates, SC	Hinsdale, Illinois
Emergency Medical Associates of Palos	Palos Heights, Illinois
IEMS	Hinsdale, Illinois
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Medicine Associates	
Lake Forest Dermatology	Bannockburn, Illinois
MidAmerica Plastic Surgery	Glen Carbon, Illinois
Pathology Associates of Aurora, LLC	Aurora, Illinois
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David L Martin MD Inc	Anderson, Indiana
Dawes Fretzin Dermatology Group	Indianapolis, Indiana
Dermatology Center of Southern Indiana	Bloomington, Indiana
Dermatology, Inc	Indianapolis, Indiana
Doctors Skin Care LLC	Indianapolis, Indiana
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Concord, Massachusetts Arlington, Massachusetts Wellesley, Massachusetts North Andover, Massachusetts Springfield, Massachusetts Springfield, Massachusetts Springfield, Massachusetts Plymouth, Massachusetts Massachusetts Worcester, Massachusetts Salem, Massachusetts Concord, Massachusetts Arlington, Massachusetts Woburn, Massachusetts Concord, Massachusetts Norwood, Massachusetts Wellesley, Massachusetts Beverly, Massachusetts Hyannis, Massachusetts Newton, Massachusetts Peabody, Massachusetts Milford, Massachusetts Haverhill, Massachusetts Lynnfield, Massachusetts Swansea, Massachusetts Attleboro, Massachusetts Boston, Massachusetts Framingham, Massachusetts Westfield, Massachusetts Grand Rapids, Michigan Grand Rapids, Michigan Michigan

**Emergency Care Specialists** EPI, PC Farmington Emergency Medicine Associates Grand River Emergency Medical Group, LLC **Greater Midland Emergency Physicians** Hastings Emergency Physicians P.L.C. Jefrey Fishman, MD Michael J Mueller, MD PC Pathology Associates, PC The Derm Institute of West Michigan Western Michigan Pathology Associates Westshore Diagnostics All About Children Pediatrics **Emergency Physicians Professional Association** Multi-Sites Anesthesiologists Obstetrics, Gynecology and Infertility **Regional Diagnostic Radiology** Southdale Anesthesiologists & Anesthetists St. Cloud Ear, Nose & Throat Mississippi Pathology Associates, PA NewSouth NeuroSpine Plastic Surgery of North Mississippi **Relias Healthcare** Singing River Pathology Clinic The Dermatology Clinic, PLLC Allegiant Pathologists LLC Alliance Health & Dermatology, LLC Anesthesia Associates of Kansas City **Capital Emergency Physicians** Columbia Dermatology and Cosmetic Surgery Dermatological Care George Dermatology

Grand Rapids, Michigan Holland, Michigan Farmington Hills, Michigan Grand Rapids, Michigan Midland, Michigan Hastings, Michigan Detroit, Michigan Flint, Michigan Flint, Michigan Grand Rapids, Michigan Holland, Michigan Muskegon, Michigan Eden Prairie, Minnesota Bloomington, Minnesota Minneapolis, Minnesota Maple Grove, Minnesota Sartell, Minnesota Edina, Minnesota St. Cloud, Minnesota Jackson, Mississippi Flowood, Mississippi Tupelo, Mississippi Tupelo, Mississippi Ocean Springs, Mississippi Gulfport, Mississippi St. Louis, Missouri Cape Girardeau, Missouri Overland Park, Missouri Jefferson City, Missouri Columbia, Missouri St. Louis, Missouri St Louis, Missouri

Hannibal Clinic, Inc. MAWD Pathology Group Meramec Dermatology, LLC **Professional Anesthetic Care** Regional Brain & Spine, LLC West County Pathologists, Inc. The Asthma and Allergy Center Northern Nevada Emergency Physicians Mark B. Constantian, MD, Professional Association Waldman Plastic Surgery and Dermatology Accurate Neuromonitoring, LLC Advanced Neurosurgery Associates Anesthesia Consultants of New Jersey Atlantic Emergency Associate Atlantic Neurosurgical Specialists Atlantic Plastic and Hand Surgery Atlantic Shore Surgical Associates Aydin Plastic Surgery **Bastidas Plastic Surgery** Brain and Spine Institute of New York and New Jersey CJSS **Coastal Pediatric Orthopedics** Contemporary Plastic Surgery East Coast Plastic Surgery, PC Girgis Family Medicine, LLC Institute of Neurological Care Jordan P. Farkas MD Monmouth Plastic Surgery Neurosurgeons of New Jersey NJ Bariatric Institute LLC North East Regional Urgent Care Association North Jersey Brain and Spine

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Northern Jersey Plastic Surgery Center, LLC Nova Dermatology Princeton Radiology Rahway Pathology, P.A. Specialty Physicians NJ, PC Summit Medical Group Surgical Associates of Hudson County Usal plastic surgery Four Corners Anesthesia 100 Ohio Street PLLC 24/7 Emergency Care, PC Albany Oral and Maxillofacial Surgery Group Alex Bruckstein, MD Gastroenterology Allergy and Asthma Associates of Murray Hill Alvin Katz, MD, PC Jacob Moalem, MD, Endocrine Surgery Atlantic Dermatologic Associates, LLP Bailey, Wakil and Auringer Eye Physicians & Surgeons Barbara Hisler, M.D. Dermatology Bruce K. Barach, MD Brummitte Dale Wilson, MD & associates Bryan S. Bilfield MD Orthopedic Surgery Canandaigua Orthopaedic Associates CCP General Surgery Central New York Physiatry, PC **Chatham Medical PC** Chinatown Medical, PLLC Christopher B. Nicora, MD, PC **City Orthopedics** Code Med Billing & Consulting LLC Cold Spring Plastic Surgery Colon and Rectal Surgery of Manhattan, P.C.

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Cosmetique Dermatology, Laser & Plastic Surgery, LLP Dara Huang MD Medical PLLC Darrick E. Antell, MD David A Schlessinger MD, PC Dong Hong Shong, MDPC Dr William Kennedy MD Dr. Donna A. Serure, Dermatology & Cosmetic Laser Surgery, PC Dr. Kiyamova MD Elizabeth Fang Emily Linda Chan, MD, PC Excelsior Integrated Medical Group PLLC **Excelsior Orthopaedics** Fay Mizue Ohsumi, MD, PLLC Felix Chu Cardiology First Care Medical Group Flushing OBGYN PC GDS Imaging Genuine Care Physician PC Glenn A Becker MD Gordon Surgical Group Great Neck ENT **Greater Rochester Internal Medicine** Greece Dermatological Associates **Greenberg Medical Services** Howard Schiff, MD and Jonathan Schiff, MD, LLP Image Plastic Surgery LLC Inspira Dermatology Jamal Rahaman Gyn Oncologist PLLC Jeffrey S Kaplan MD John A Perrotti MD PLLC John Thomas, MD, Hand & Wrist Surgery

New York, New York Smithtown, New York Albany, New York New York, New York New York, New York New York, New York Buffalo, New York New York City, New York New York, New York New York City, New York Flushing, New York Bronx, New York Forest Hills, New York New York, New York Putnam Valley, New York Great Neck, New York Rochester, New York Rochester, New York Long Island, New York New York, New York New York New York, New York Flushing, New York New York, New York New Hyde Park, New York New York, New York Long Island City, New York

Greenvale, New York

New York, New York

New York, New York

Woodbury, New York

Flushing, New York

Kazim Doganay, MD, PLLC Keith M. Blechman, M.D., P.C. Laura Whitman MD Leo M. Michalek Jr., M.D. Libby Buscemi, MD, PC Little Tsingtao Medical P.C. Long Island Behavioral Medicine Long Island Hand to Shoulder Center Long Island Otolaryngology Long Island Plastic Surgical Group, P.C. Long Island Spine Specialists, P.C. Main Street Internal Medicine, PLLC Marc Everett MD PC Mariwalla Neurosurgery Maurice M Khosh MD PC Michael Afshari MD OB/GYN Michael S. Hahn, MD PC Neurosurgery Mrudangi Thakur Plastic & Reconstructive Surgery PC Nancy Tice D.O Psychiatry Nassau Anesthesia Associates Nassau Chest Physicians P.C. Nassau Plastic Surgical Associates, PC Nassau Suffolk Medical Neuro Protective Solutions, LLC NeuroAxis Neurosurgical Associates Neurological Surgery P.C. New York Cardiovascular Anesthesiologists New York Eye & Laser PC New York Minimally Invasive Surgery PLLC New York Ophthalmology Associates New York Pain Management New York Spine and Brain Surgery

West Islip, New York New York, New York New York, New York West Seneca, New York New York New York, New York Islandia, New York Huntington, New York Huntington, New York Garden City, New York Commack, New York Huntington, New York New York, New York Jefferson Valley, New York Merrick NY, New York Mineola, New York Great Neck, New York Jericho, New York West Babylon, New York Hauppauge, New York Port Washington, New York Long Island, New York Roslyn, New York Flushing, New York New York, New York New York, New York Clifton Park, New York Stony Brook, New York

North Fork Radiology North Shore Hyperbarics Northeast Hand Specialists NY Medical Skin Solutions **Oneonta Surgical Associatives** Oppenheim & Degen, Neurological Surgeons, LLP Orange County Psychiatric Services Orthopaedic Associates of Manhasset Orthopedic Associates of Dutchess County Orthopedic Spine Care of Long Island, PC Pain Institute of Long Island Park Avenue Medical Professionals Patel MDs Pathology, Molecular, Cell-Based Medicine Pediatric ENT Associates Plastic Surgeons of the Hudson Valley Plastic Surgery of Westchester Premium Medical Care Priority 1 Urgent Care Propeak Sports Medicine, LLC Rachel Farkas Surgery RC Wellness Medical, P.C. Rene Eng, MD Gastroenterology Rhinebeck Surgical Richard A. Schoor MD, PC Urology Richard G Gagnier MD Internal Medicine **Riverdale Medicine LLP** Robert T. Grant, MD **Rochester General Surgery** Rochester Regional Health Surgery / Breast Rye Radiology Assoc., LLP Saratoga Springs Pathology, PC

Riverhead, New York Great Neck, New York New York, New York New York, New York New York, New York West Nyack, New York Goshen, New York Great Neck, New York Poughkeepsie, New York Huntington, New York Port Jefferson, New York New York, New York New York, New York New York, New York Amherst, New York Poughkeepsie, New York Harrison, New York Flushing, New York Guilderland, New York Huntington, New York Rochester, New York Brookly, New York New York, New York Rhinebeck, New York Smithtown, New York New York, New York Bronx, New York New York, New York Rochester, New York Rochester, New York Rye Brook, New York Saratoga Springs, New York Scot Bradley Glasberg, M.D. Sefan G. Chevalier, DO, PC Shah Plastic Surgery Shidong Su, MD, PC Soho Otolaryngology PC Spine Medical Services, PLLC Steven Fried, MD, PC Pediatrics Suffolk Plastic Surgeons Syosset Endocrinology The Brooklyn Gynecological Society The Plastic and Reconstructive Surgery Group, PC Thomas P. Sterry, MD, PC **Tribeca Radiation** Troy Urology Associates UB Neurosurgery, Inc. Wai Lap Leung, MD Weihong Yan OBGYN Westchester - Bronx OB/GYN Group Wu Xuxia Medicine PC Xiao Huifang Obstetrics & Gynecology PC City Derm NYC Carolina Neurosurgery & Spine Associates Central Carolina Surgery, PA **Coastal Plains Pathology Associates** Charlotte Radiology Criswell & Criswell Plastic Surgery **Digestive Disease Center** Eastern Carolina Pathology Associates Eastern Medical Associates, PA ECEP II, PA Forsyth Plastic Surgery GEMS

New York, New York New York, New York New York, New York Flushing, New York New York, New York Hauppauge, New York Great Neck, New York Setauket, New York Syosset, New York Brooklyn, New York Poughkeepsie, New York New York, New York New York, New York Troy, New York Buffalo, New York New York City, New York Queens, New York Yonkers, New York New York, New York Flushing, New York New York Charlotte, North Carolina Greensboro, North Carolina Wilson, North Carolina Charlotte, North Carolina North Carolina Goldsboro, North Carolina Wilson, North Carolina Goldsboro, North Carolina Wilmington, North Carolina Winston-Salem, North Carolina Goldsboro, North Carolina

Goldsboro Pediatrics, PA Goldsboro, North Carolina Graper Harper Cosmetic Surgery Charlotte, North Carolina **Huggins Surgical** Conover, North Carolina Longleaf Medical Pinehurst, North Carolina Mario A Cerame, MD Rocky Mount, North Carolina Miles Surgical, PLLC Wilmington, North Carolina North Raleigh Plastic Surgery Raleigh, North Carolina Novant Bariatric Surgery Kernersville, North Carolina Port City Neurosurgery & Spine Wilmington, North Carolina Raleigh Neurosurgical Clinic, Inc. Raleigh, North Carolina Rex UNC Hospitalists at Wayne Memorial Goldsboro, North Carolina Shelby Pathology Group Shelby, North Carolina Goldsboro, North Carolina UNC Surgical Specialists at Goldsboro Wake Emergency Physicians, PA Raleigh, North Carolina Wake Plastic Surgery Cary, North Carolina Wayne Radiologists, P.A. Goldsboro, North Carolina Wilmington Pathology Associates North Carolina Affiliated Dermatology and Cosmetic Surgery Centers Inc. Ohio, Ohio Akron Dermatology Akron, Ohio Associates in Dermatology, Inc Westlake, Ohio Blanchard Valley Medical Associates Findlay, Ohio City Dermatology and Laser Cincinnati, Ohio Columbus Skin Surgery Center Dublin, Ohio Community Emergency Medicine Partners Centerville, Ohio Dermatology & Surgery of So. Ohio, Inc. Fairfield, Ohio Dermatology and Skin Care Associates Mason, Ohio Dermatology Associates, Inc. Perrysburg, Ohio Donna Krummen, M.D., Plastic and Reconstructive Cincinnati, Ohio Surgery Dr. Rodney A. Green, M.D., FACS Lyndhurst, Ohio Emergency Medicine Specialists, Inc. Miamisburg, Ohio Fairlawn Dermatology Akron, Ohio

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Hilltop Ambulatory Surgery Center LLC	Lyndhurst, Ohio
HMT Dermatology Associates, Inc.	Medina, Ohio
Jaye E. Benjamin M.D. Dermatology	Willoughby, Ohio
Kenneth L. Arsham, MD	Beachwood, Ohio
Kenwood Dermatology	Cincinnati, Ohio
Lima Pathology Associates	Lima, Ohio
Mid-Ohio Emergency Services, LLC	Columbus, Ohio
Oakview Dermatology LLC	Athens, Ohio
Ohio Skin Care Institute	Columbus, Ohio
Paragon Women's Care	Dayton, Ohio
PhoenixDerm	Canton, Ohio
Physicians Emergency Services, Inc.	Ravenna, Ohio
Preferred Plastic Surgery	Dayton, Ohio
Surfield Plastic Surgery	Sandusky, Ohio
Surgical Associates of Springfield, Inc	Springfield, Ohio
Universal Dermatology & Vein care	Columbus, Ohio
Wheatland Dermatology	St. Marys, Ohio
AMG St John Neurosurgery	Tulsa, Oklahoma
Emergency Physicians of Midwest City	Midwest City, Oklahoma
Neuroscience Specialists	Oklahoma City, Oklahoma
Spectrum Dermatology	Edmond, Oklahoma
St. John Emergency Physicians	Tulsa, Oklahoma
The Pathology Group, PC	Oklahoma City, Oklahoma
Marys Peak Emergency Physician	Oregon
Movassaghi Plastic Surgery	Eugene, Oregon
NW Dermatology Institute	Portland, Oregon
Pathology Consultants, PC	Springfield, Oregon
Pursuit Sports Medicine	Portland, Oregon
Abington Emergency Physician Associates (AEPA)	Abington, Pennsylvania
Argires Marotti Neurosurgical Associates of Lancaster	Lancaster, Pennsylvania
Bucks ENT	Langhorne, Pennsylvania

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Langhorne, Pennsylvania Pittsburgh, Pennsylvania Langhorne, Pennsylvania Erie, Pennsylvania Doylestown, Pennsylvania State College, Pennsylvania Yardley, Pennsylvania Phildelphia, Pennsylvania Wynnewood, Pennsylvania Bryn Mawr, Pennsylvania Pittsburgh, Pennsylvania Langhorne, Pennsylvania Pennsylvania Warrington, Pennsylvania Bryn Mawr, Pennsylvania Scranton, Pennsylvania Erie, Pennsylvania Wyomissing, Pennsylvania Swarthmore, Pennsylvania Plymouth Meeting, Pennsylvania Greensburg, Pennsylvania Cumberland, Rhode Island Warwick, Rhode Island East Greenwich, Rhode Island Warwick, Rhode Island Wakefield, Rhode Island Greenville, South Carolina Greenwood, South Carolina Anderson, South Carolina Camden, South Carolina Sumter, South Carolina Aiken, South Carolina

Charleston Allergy and Asthma **Cheraw Pediatrics Coastal Cancer Center Coastal Vascular and Vein** Consultants in Gastroenterology, PA Dermatology Associates of the Lowcountry. Dermatology Associates, PA EmergencyMD LLC Foothills Anesthesia Consultants Highlands Center for Women Jeffrey Siegel, MD LCMA McLeod Emergency Physicians Midlands Orthopaedics & Neurosurgery OrthoSC **Pitts Radiology Associates** Plastic Surgery Consultants LLC Southern Coast Pain Specialists **Stokes Regional Eye Centers** The Facial Surgery Center Weniger Plastic Surgery Anesthesiology Associates, Inc. Black Hills Neurosurgery & Spine Dakota Dermatology Physician's Laboratory, LTD Anatomic and Clinical Laboratory Associates Anesthesia and Pain Consultants Caroline H Chester, MD, PC **Complete Breast Care** Daniel A. Hatef, MD **Dermatopathology Partners** EmergiTrust

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Innova Dermatology	Hendersonville, Tennessee
Knoxville Center for Dermatology and Plastic Surgery	Knoxville, Tennessee
Middle Tennessee Emergency Physicians	Nashville, Tennessee
Nashville Skin	Nashville, Tennessee
Nashville Vascular and Vein Institiute	Nashville, Tennessee
PathGroup	Nashville, Tennessee
Premier Surgical Associates	Knoxville, Tennessee
Semmes-Murphey Clinic PC	Memphis, Tennessee
Tennessee Orthopedic Clinic	Knoxville, Tennessee
The Skin Wellness Center	Knoxville, Tennessee
The Surgical Clinic	Nashville, Tennessee
University Physician's Association (UPA)	Knoxville, Tennessee
University Surgical Associates	Chattanooga, Tennessee
University Surgical Associates	Chattanooga, Tennessee
Wright Dermatology, PLLC	Medina, Tennessee
ADAGIO Dermatology & Aesthetics	Tyler, Texas
American Institute of Toxicology Laboratories (AIT Labs, A	Denton, Texas
American Institute of Toxicology Laboratories (AIT Labs, A HealthTrackRx Company)	Denton, Texas
	Denton, Texas Dallas, Texas
HealthTrackRx Company)	
HealthTrackRx Company) Arlington Plastic Surgery	Dallas, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery	Dallas, Texas Houston, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery Baylor Scott and White Emerus 24 Hour Physicians PA	Dallas, Texas Houston, Texas Dallas, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery Baylor Scott and White Emerus 24 Hour Physicians PA Beaumont Emergency Medicine Associates	Dallas, Texas Houston, Texas Dallas, Texas Beaumont, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery Baylor Scott and White Emerus 24 Hour Physicians PA Beaumont Emergency Medicine Associates Central Texas Colon and Rectal Surgeons	Dallas, Texas Houston, Texas Dallas, Texas Beaumont, Texas Austin, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery Baylor Scott and White Emerus 24 Hour Physicians PA Beaumont Emergency Medicine Associates Central Texas Colon and Rectal Surgeons Cocco Clinique MD	Dallas, Texas Houston, Texas Dallas, Texas Beaumont, Texas Austin, Texas Dallas, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery Baylor Scott and White Emerus 24 Hour Physicians PA Beaumont Emergency Medicine Associates Central Texas Colon and Rectal Surgeons Cocco Clinique MD CompRad	Dallas, Texas Houston, Texas Dallas, Texas Beaumont, Texas Austin, Texas Dallas, Texas Houston, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery Baylor Scott and White Emerus 24 Hour Physicians PA Beaumont Emergency Medicine Associates Central Texas Colon and Rectal Surgeons Cocco Clinique MD CompRad Dermatology & Skin Surgery Institute of North Texas	Dallas, Texas Houston, Texas Dallas, Texas Beaumont, Texas Austin, Texas Dallas, Texas Houston, Texas Frisco, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery Baylor Scott and White Emerus 24 Hour Physicians PA Beaumont Emergency Medicine Associates Central Texas Colon and Rectal Surgeons Cocco Clinique MD CompRad Dermatology & Skin Surgery Institute of North Texas Elect Dermatology	Dallas, Texas Houston, Texas Dallas, Texas Beaumont, Texas Austin, Texas Dallas, Texas Houston, Texas Frisco, Texas New Braunfels, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery Baylor Scott and White Emerus 24 Hour Physicians PA Beaumont Emergency Medicine Associates Central Texas Colon and Rectal Surgeons Cocco Clinique MD CompRad Dermatology & Skin Surgery Institute of North Texas Elect Dermatology Family Emergency Room at Georgetown	Dallas, Texas Houston, Texas Dallas, Texas Beaumont, Texas Austin, Texas Dallas, Texas Houston, Texas Frisco, Texas New Braunfels, Texas Georgetown, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery Baylor Scott and White Emerus 24 Hour Physicians PA Beaumont Emergency Medicine Associates Central Texas Colon and Rectal Surgeons Cocco Clinique MD CompRad Dermatology & Skin Surgery Institute of North Texas Elect Dermatology Family Emergency Room at Georgetown General and Vascular Surgery of Ennis	Dallas, Texas Houston, Texas Dallas, Texas Beaumont, Texas Austin, Texas Dallas, Texas Houston, Texas Frisco, Texas New Braunfels, Texas Georgetown, Texas Ennis, Texas
HealthTrackRx Company) Arlington Plastic Surgery Banerji Plastic Surgery Baylor Scott and White Emerus 24 Hour Physicians PA Beaumont Emergency Medicine Associates Central Texas Colon and Rectal Surgeons Cocco Clinique MD CompRad Dermatology & Skin Surgery Institute of North Texas Elect Dermatology Family Emergency Room at Georgetown General and Vascular Surgery of Ennis Innovative Dermatology, PA	Dallas, Texas Houston, Texas Dallas, Texas Beaumont, Texas Austin, Texas Dallas, Texas Houston, Texas Frisco, Texas New Braunfels, Texas Georgetown, Texas Ennis, Texas

Laboratory Physicians Association	Dallas, Texas
Leading Edge Medical Associates	Longview, Texas
Livingston Plastic Surgery	Houston, Texas
Lone Star Anesthesia Consultants	Amarillo, Texas
MD Pathology	Plano, Texas
Michelle Hebert, MD (Gulf Coast Pathology Associates)	Conroe, Texas
Midland Emergency Management	Midland, Texas
North Hills Family Medicine	Keller, Texas
Pathology Associates of San Antonio / Pathology	San Antonio, Texas
Reference Laboratory	
Physicians PremiER ER	Corpus Christi, Texas
Radiology & Imaging of South Texas LLP	Corpus Christi, Texas
Regional Pathology Associates	Victoria, Texas
Rio Grande Pathology Services, PA	El Paso, Texas
Robert J Schwartz MD PA	Dallas, Texas
Shannon M Juno, MD, PA OB/GYN	La Grange, Texas
South Texas Pathology Associates	San Antonio, Texas
South Texas Radiology Group	San Antonio, Texas
Texas Spine & Neurosurgery Center, PA	Sugar Land, Texas
The Craniofacial & Plastic Surgery Center Houston	Houston, Texas
Thrive Family Dermatology, PLLC	Allen, Texas
Tyler Neurosurgical Associates, P.A.	Tyler, Texas
Valley Emergency Physicians, LLP	Harlingen, Texas
Victoria Anesthesiology Associates, LLP	Victoria, Texas
Warthan Dermatology	Fort Worth, Texas
William S Gilmer MD PA	Houston, Texas
WLS Surgical Associates	Dallas, Texas
Interwest Anesthesia Associates	Logan, Utah
Mountain West Anesthesia, LLC	Salt Lake City, Utah
North Valley Emergency Physicians	American Fork, Utah
Utah Cosmetic Surgery	Murray, Utah
Utah Emergency Physicians	Salt Lake City, Utah

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Roberta Gartside, MD, FACS Shenandoah Dermatology The Art and Science of Dermatology, P.C. The Spine Care Center Verum Cutis Dermatology Williamsburg Emergency Physicians, Inc Winchester Anesthesiologists, LLC Advanced Dermatology & Skin Surgery, PLLC Associated Emergency Physicians, Inc,, P.S. Bellingham Anesthesia Associates, PS Cascade Emergency Associates Cascade Emergency Physicians Eastside Emergency Physicians EMA **Evergreen Emergency Services** Mt Rainier Emergency Physicians Northwest Pathology, P.S. Olympia Emergency Services PLLC South Sound Surgical Associates Spokane Emergency Care Physicians Swedish Surgical Specialists **Tacoma Emergency Care Physicians** Western Washington Emergency Physicians Yarrow Bay Plastic Surgery CellNetix Pathology Bandak Plastic Surgery General Anesthesia Services, Inc. Associated Pathologists, S.C. Barbara A Hummel, MD., SC Emergency Medicine Associates of Madison Emergency Medicine Specialists, SC ERMED, SC

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